STATE OF MICHIGAN

JAMES J. BLANCHARD, Governor

DEPARTMENT OF NATURAL RESOURCES

STEVENS T. MASON BUILDING
BOX 30028
LANSING, MI 48909

GORDON E. GUYER, Director

May 11, 1988

Mr. Jerome S. Amber
Principal Staff Engineer
Stationary Source Environmental Control Office
Ford Motor Company
Suite 608
15201 Century Drive
Dearborn, Michigan 48120

Dear Mr. Amber:

SUBJECT: Romeo Tractor & Equipment Plant
Withdrawal of RCRA Part A
MID 078 400 165

We have reviewed the information provided in your letter of April 2, 1987, and our Detroit District office has reviewed your facility files. The District has determined that only phosphating wastes were discharged to the onsite surface impoundments and that there is no supporting information available to indicate that any other listed wastes were placed in the impoundments. Based on our review, we concur that there is no information available to indicate that any wastes other than phosphating wastes were placed in the on-site surface impoundments. Therefore, by copy of this letter, we are advising EPA, that MDNR considers the two wastewater treatment surface impoundments to be solid waste management units only.

Please be aware that the closure of RCRA interim status units (the drum storage area closed in 1985) does not release the facility from its responsibilities under the Hazardous and Solid Waste Amendments of 1984, (HSWA). Corrective action may still have to be addressed if the U.S. EPA determines that a release of hazardous waste or hazardous constituents has taken place.

If you have any additional questions, please contact me.

Sincerely,

Alan J. Howard, Chief
Waste Management Division
517-373-2730

cc: Ms. Mary Sabadaszka, U.S. EPA
Mr. Rich Traub, U.S. EPA
Ms. Andrea Schoenrock, WMD
Mr. Larry AuBuchon, Detroit District, WMD
Mr. Kenneth Burda, WMD/C&E File

NPDES PERMIT # MI-0045179
FORD NEW HOLLAND, INC.

Cathy S. aj

Ford Tractor Operations
Ford New Holland, Inc.

Romeo Tractor and
Equipment Plant
701 East 32 Mile Road
Romeo, Michigan 48065

January 13, 1988

Mr. R. Schrameck, District Supervisor
Detroit Area District Office
DEPARTMENT OF NATURAL RESOURCES
505 West Main Street
Northville, MI 48167

Dear Mr. Schrameck:

Please find enclosed the information requested to comply with NPDES Permit #0045179 for the Romeo Tractor Plant of Ford New Holland, Inc.

Should additional information or a different reporting format be required, do not hesitate to contact Alan Myefski at the writer's address for assistance.

Yours very truly,

J. D. Rank,
Plant Manager

Attachment

Environmental and Safety Engineering Staff
Ford Motor Company

Suite 608
15201 Century Drive
Dearborn, Michigan 48120

February 13, 1987

Roy Schrameck, District Supervisor
Michigan Department of Natural Resources
Detroit Area District Office
505 West Main Street
Northville, MI 48167

Subject: NPDES Permit No. MI 0045179 -- Ford New Holland, Romeo Tractor and Equipment Plant

Dear Mr. Schrameck:

Although the subject permit was issued December 19, 1986, we were not informed of the issuance until February 2, 1987 during a conversation I had with Mr. C. Bek. A copy was not received until February 11, 1987. To document and inform you of this notification delay, Mr. Bek suggested we send this letter.

Part IB.2.d provides an exemption from self-monitoring for 90 days after permit issuance. As more than six weeks of this "exemption" passed without our knowledge, we believe that the 90-day exemption period should begin with our February 2 notification date. Frankly, we question whether the permit could be legally considered issued for such a permit condition triggering purpose absent constructive notification to us.

Sincerely,

Martin F. Whitehead

M. F. Whitehead
Principal Facility Engineer
Stationary Source Environmental
Control Office

mfw5/L

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RECEIVED
JAN 1 5 1987
SWQD PERMITS

Environmental and Safety Engineering Staff
Ford Motor Company

Suite 608
15201 Century Drive
Dearborn, Michigan 48120

January 8, 1987

Mr. Chang M. Bek
Permits Section
Surface Water Quality Division
Department of Natural Resources
P.O. Box 30028
Lansing, MI 48909

Subject: NPDES Permit No. MI 0045179 -- Romeo Tractor Plant
Name Change

Dear Mr. Bek:

Confirming our discussion today, the subject permit was proposed on October 24, 1986 for the Ford Romeo Tractor Plant. Effective January 1, 1987, the plant name changed to the Ford New Holland, Inc.(*), Romeo Tractor and Equipment Plant. Please make the name change prior to issuance of the final NPDES permit.

Sincerely yours,

M. F. Whitehead

M. F. Whitehead
Principal Facility Engineer
Stationary Source Environmental
Control Office

cc: G. Kircos

mfw6/L

(*) 2500 Maple Rd
Troy, MI 48084

RECEIVED
JAN 22
WATER QUALITY DIV.
DIST. 1

xc: R. Schrameck

September 16, 1986

Mr. F. P. Nixxon
Principal Staff Engineer
Stationary Source Environmental Control Office
Ford Motor Company
Suite 608
15201 Century Drive
Dearborn, Michigan 48120

Re: NPDES Permit No. MI 0045179
Ford Romeo Tractor & Equipment
Plant

Dear Mr. Nixon:

Enclosed is a copy of your draft NPDES permit and public notice/fact sheet. Please review these documents carefully. If you have any comments on the terms and conditions of this permit, including standard permit language, please forward them to us prior to October 17, 1986, so that we can consider them before the draft permit is placed on public notice.

The conditions of this draft permit have been considered on a case-specific basis and the monitoring program is considered the minimum which will assure environmental protection.

If you have any questions, please contact me.

Sincerely,

Chang M. Bek
Permits Section
Surface Water Quality Division
517-335-4131

cc: Mr. Roy Schrameck
Files

DRAFT PERMIT

Permit No. MI 0045179

MICHIGAN WATER RESOURCES COMMISSION
AUTHORIZATION TO DISCHARGE UNDER THE
NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM

In compliance with the provision of the Federal Water Pollution Control Act, as amended, (33, U.S.C. 1251 et seq; the "Act"), and the Michigan Water Resources Commission Act, as amended, (Act 245, Public Acts of 1929, as amended, the "Michigan Act"),

Ford Motor Company
15201 Century Drive
Suite 608
Dearborn, Michigan 48120

is authorized to discharge from a facility located at

Romeo Tractor & Equipment Plant
701 E. 32 Mile Road
Romeo, Michigan 48065

designated as Ford Romeo Tractor Plant
to receiving water named East Pond Creek

in accordance with effluent limitations, monitoring requirements and other conditions set forth in Parts I and II hereof.

This permit takes effect immediately upon the date of issuance. Any person who feels aggrieved by this permit may file a sworn petition with the Commission, setting forth the conditions of the permit which are being challenged and specifying the grounds for the challenge. The Commission may reject any petition filed more than 60 days after issuance as being untimely. Upon granting of a contested case to the applicant, the Commission shall review the permit to determine which contested terms shall be stayed until the Commission takes its final action. All other conditions of the permit remain in full effect. If the contested condition is a modification of a previous permit condition and the Commission determines the contested condition shall be stayed, then such previous condition remains in effect until the Commission takes final action. During the course of any administrative proceeding brought by a person other than the applicant, the conditions of this permit will remain in effect, unless the Commission determines otherwise.

This permit and the authorization to discharge shall expire at midnight November 30, 1991. In order to receive authorization to discharge beyond the date of expiration, the permittee shall submit such information and forms as are required by the Michigan Water Resources Commission no later than 180 days prior to the date of expiration.

This permit is based on an application dated January 27, 1982 and updated September 9, 1986, and shall supersede any and all Orders of Determination, Stipulation, Final Orders of Determination, or NPDES Permits previously adopted by the Michigan Water Resources Commission.

Issued this _____ day of _____, by the Michigan Water Resources Commission

Paul D. Zugger
Executive Secretary

New Permit

PART I

A. EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

1. Final Effluent Limitations

During the period beginning on the effective date of this permit and lasting until the expiration date of this permit, the permittee is authorized to discharge up to sixty-six thousand (66,000) gallons per day of noncontact cooling water and an unspecified amount of stormwater and groundwater infiltration from outfall 003 to East Pond Creek. Such discharge shall be limited and monitored by the permittee as specified below:

Effluent Characteristic	Discharge Limitations kg/day (lbs/day) Monthly Average	Daily Maximum	Other Limitations Monthly Average	Daily Maximum	Monitoring Requirements Measurement Frequency	Sample Type
Retained Self-Monitoring Requirements, Part I.B.2.b. (page 4 of 6)						
Flow, M^3/ Day (MGD)					Weekly	
Outfall Observation*					Daily	Visual

*Any unusual characteristics of the discharge (i.e., unnatural turbidity, color, oil film, floating solids, foams, settleable solids, or deposits) shall be reported immediately to the District Office of the Surface Water Quality Division followed with a written report within 5 days detailing the findings of the investigation and the steps taken to correct the condition.

The term noncontact cooling water shall mean water used for cooling which does not come into direct contact with any raw material, intermediate product, by-product, waste product, or finished product.

a. The receiving stream shall contain no unnatural turbidity, color, oil film, floating solids, foams, settleable solids, or deposits as a result of this discharge.

b. Samples, measurements and observations taken in compliance with the monitoring requirements above shall be taken : Flow - noncontact cooling water before mixing with stormwater or groundwater infiltration; outfall observation - at outfall 003.

c. In the event the permittee shall require the discharge of water treatment additives in addition to any previously approved by the Chief of the Surface Water Quality Division, the permittee shall notify the Division Chief. Written approval from the Chief of the Surface Water Quality Divison to discharge such additives at specified levels shall be obtained prior to discharge by the permittee. The permit will be modified in accordance with the requirements of Part II, Section B-4 if a constituent of the additive or additives requires limiting.

Special Condition - Reopener Clause

This permit may be modified or, alternatively, revoked and reissued to comply with any applicable standard(s) or limitation(s) promulgated under Section 301(b)(2)(c)(d), 304(b)(2) and 307(a)(2) of the Act, if the effluent standard(s) or limitation(s) so promulgated:

a. is(are) either different in condition or more stringent than any effluent limitation in the permit; or

b. control(s) any pollutant not limited in the permit.

3. Special Condition - Notification Requirement

The discharger shall notify the Chief of the Surface Water Quality Division, in writing, within 10 days of knowing, or having reason to believe, that a change in facility operation, maintenance, or construction has resulted or will result in the discharge of:

a. Detectable levels* of chemicals on the current Michigan Critical Materials Register or priority pollutants or hazardous substances set forth in 40 CFR 122.21, Appendix D, which were not acknowledged in the application** or listed in the application at less than detectable levels.

b. Detectable levels* of any other chemical not listed in the application or listed at less than detection, for which the application specifically requested information.

c. Any chemical at levels greater than five times the average level reported in the application**.

Any other monitoring results obtained as a requirement of this permit shall be reported in accordance with the schedule of compliance.

*The detectable level shall be defined as the Method Detection Limit (MDL) as given in Appendix B to Part 136, Federal Register, Vol. 49, No. 209, October 26, 1984, pp. 43430-31.

**The application dated January 27, 1982 and updated September 9, 1986

PART I

B. MONITORING AND REPORTING

1. Representative Sampling

Samples and measurements taken as required herein shall be representative of the volume and nature of the monitored discharge.

2. Reporting: [A] = applicable to your facility; [NA] = not applicable to your facility

[NA] a. MOR Submittal Requirements - The permittee shall submit Monthly Operating Report (MOR) forms to the Surface Water Quality Division, Data Entry, of the Michigan Department of Natural Resources for each calendar month of the authorized discharge period(s). The MOR's shall be postmarked no later than the 10th day of the month following each month of the authorized discharge period(s).

[A] b. Retained Self-Monitoring Requirements - The permittee shall maintain a year-to-date log of retained self-monitoring results and provide such log for inspection to the staff of the

- [X] (1.) Surface Water Quality Division of the Michigan Department of Natural Resources.
- [ ] (2.) Environmental Health Services Division, Michigan Department of Public Health
- [ ] (3.) Northern Peninsula Division, Michigan Department of Public Health
- [ ] (4.) Division of Health Facility Licensing & Certification, Michigan Department of Public Health

upon request.

The permittee shall certify, in writing, to the Chief of the Surface Water Quality Division of the Department of Natural Resources in accordance with the Schedule of Compliance Part I, C-___, that;

(1.) all retained self-monitoring requirements have been complied with and a year-to-date log has been maintained.
(2.) the flow rate(s) (if part of retained self-monitoring results) from all outfalls have been substantially the same as the flow rate(s) authorized by this permit or if
(3.) the flow rate(s) (if part of retained self-monitoring results) is (are) substantially different from the flow rate(s) authorized by this permit and the permittee shall provide reasons for the difference in flow rates.

[NA] c. Groundwater Monitoring - The permittee shall submit Monthly Operating Report (MOR) forms to the Surface Water Quality Division, Data Entry, of the Michigan Department of Natural Resources in accordance with the monitoring requirements set forth in Part I, A-____. The MOR's shall be postmarked no later than the 10th day of the Month following each completed report period.

[A] d. First Permit - Existing or Proposed Facility - Upon issuance of the first permit for an existing or proposed facility the permittee is exempt from submitting MOR's for a period of ninety (90) days from the date the permit is issued.

[NA] e. Permit Reissuance or Modification - For any parameter added to the monitoring requirements as a result of permit reissuance or modification of the current permit, the permittee will be exempt from submitting MOR data for that parameter for a period of ninety (90) days from the date the permit is issued.

3. Definitions

a. The monthly average discharge is defined as the total discharge by weight, or concentration if specified, during the reporting month divided by the number of days in the reporting month that the discharge from the production or commercial facility occurred. When less than daily sampling occurs, the monthly average discharge shall be determined by the summation of the measured daily discharges by weight, or concentration if specified, divided by the number of days during the reporting month when the samples were collected, analyzed and reported.

b. The daily maximum discharge means the total discharge by weight, or concentration if specified, during any calendar day.

c. The Regional Administrator is defined as the Region V Administrator, U.S. EPA, located at 230 South Dearborn, 13th Floor, Chicago, Illinois 60604.

d. The Michigan Water Resources Commission is located in the STEVENS T. MASON BUILDING. The mailing address is Box 30028, Lansing, Michigan 48909.

4. Test Procedures

Test procedures for the analysis of pollutants shall conform to regulations published pursuant to Section 304(h) of the Act, under which such procedures may be required.

5. Recording Results

For each measurement or sample taken pursuant to the requirements of this permit, the permittee shall record the following information:

a. The exact place, date, and time of sampling;

b. The dates the analyses were performed;

c. The person(s) who performed the analyses;

d. The analytical techniques or methods used; and

e. The results of all required analyses.

6. Additional Monitoring by Permittee

If the permittee monitors any pollutant at the location(s) designated herein more frequently than required by this permit, using approved analytical methods as specified above, the results of such monitoring shall be included in the calculation and reporting of the values required in the Monthly Operating Report. Such increased frequency shall also be indicated.

7. Records Retention

All records and information resulting from the monitoring activities required by this permit including all records of analyses performed and calibration and maintenance of instrumentation and recordings from continuous monitoring instrumentation shall be retained for a minimum of three (3) years, or longer if requested by the Regional Administrator or the Michigan Water Resources Commission.

C. SCHEDULE OF COMPLIANCE

1. The permittee shall continue to operate the installed facilities to achieve the effluent limitations specified for outfall 003

2. The permittee shall comply with the requirements of section 10, Part II-A in accordance with the following:

a. Submit plans for approval to the Chief of the Surface Water Quality Division necessary to comply with the primary power provision of Section 10 in Part II on or before NA.

b. The permittee shall comply with the requirements of items 10a or 10b contained in Part II on or before NA. Notwithstanding the preceding sentence, the permittee shall at all times halt, reduce, or otherwise control production in order to protect the waters of the State of Michigan upon reduction or loss of the primary source of power.

3. On or before January 10th of each year, during the effectiveness of this permit, the permittee shall submit the retained self-monitoring written certifi0 cation as required in the Monitoring and Reporting Section of this permit. The certification shall be submitted to the Chief of the appropriate division responsible for compliance with this permit.

PART II

A. MANAGEMENT REQUIREMENTS

1. Duty to Comply

All discharges authorized herein shall be consistent with the terms and conditions of this permit. The discharge of any pollutant identified in this permit more frequently than or at a level in excess of that authorized shall constitute a violation of the permit.

It is the duty of the permittee to comply with all the terms and conditions of this permit. Any noncompliance with the Effluent Limitations, Special Conditions, or terms of this permit constitutes a violation of Public Acts 245 of 1929, as amended, and/or PL 92-500, as amended, and constitutes grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or denial of an application for permit renewal.

2. Change of Conditions

Any anticipated facility expansion, production increases, or process modification which will result in new, different, or increased discharges of pollutants must be reported by submission of a new application or, if such changes will not violate the effluent limitations specified in this permit, by notice to the permit issuing authority of such changes. Following such notice, the permit may be modified to specify and limit any pollutant not previously limited.

3. Containment Facilities

The permittee shall provide facilities for containment of any accidental losses of concentrated solutions, acids, alkalies, salts, oils, or other polluting materials in accordance with the requirements of the Michigan Water Resources Commission Rules, Part 5. This requirement is included pursuant to Section 5 of the Michigan Water Resources Commission Act, 1929 PA 245, as amended, and the Part 5 rules of the General Rules of the Commission.

4. Operator Certification

The permittee shall have the waste treatment facilities under direct supervision of an operator certified by the Michigan Water Resources Commission, as required by Section 6a of the Michigan Act.

5. Noncompliance Notification

If, for any reason, the permittee does not comply with or will be unable to comply with any daily maximum effluent limitation specified in this permit, the permittee shall provide the Chief of the Surface Water Quality Division with the following information, in writing, within five (5) days of becoming aware of such condition:

a. A description of the discharge and cause of noncompliance; and

b. The period of noncompliance, including exact dates and times; or, if not corrected, the anticipated time the noncompliance is expected to continue, and the steps taken to reduce, eliminate and prevent recurrence of the noncomplying discharge.

6. Spill Notification

The permittee shall immediately report any spill or loss of any product, by-product, intermediate product, oils, solvents, waste material, or any other polluting substance which occurs to the surface waters or groundwaters of the state by calling the Department of Natural Resources 24-hour Emergency Response telephone number 1-800-292-4706; and the permittee shall within ten (10) days of the spill or loss, provide the state with a full written explanation as to the cause and discovery of the spill or loss, clean-up and recovery measures taken, preventative measures to be taken, and schedule of implementation. This requirement is included pursuant to Section 5 of the Michigan Water Resources Commission Act, 1929 PA 245, as amended.

7. Facility Operation

The permittee shall at all times properly operate and maintain all treatment or control facilities or systems installed or used by the permittee to achieve compliance with the terms and conditions of this permit.

8. Adverse Impact

The permittee shall take all reasonable steps to minimize any adverse impact to the surface or groundwaters of the state resulting from noncompliance with any effluent limitation specified in this permit including, but not limited to, such accelerated or additional monitoring as necessary to determine the nature and impact of the discharge in noncompliance.

9. By-Passing

Any diversion from or by-pass of facilities necessary to maintain compliance with the terms and conditions of this permit is prohibited, except (i) where unavoidable to prevent loss of life, personal injury, or severe property damage, or (ii) where excessive storm drainage or runoff would damage any facilities necessary for compliance with the effluent limitations and prohibitions of this permit. The permittee shall promptly notify the Michigan Water Resources Commission and the Regional Administrator, in writing, of such diversion or by-pass.

10. Power Failures

In order to maintain compliance with the effluent limitations and prohibitions of this permit, the permittee shall either:

a. Provide an alternative power source sufficient to operate facilities utilized by permittee to maintain compliance with the effluent limitations and conditions of this permit which provision shall be indicated in this permit by inclusion of a specific compliance date in each appropriate "Schedule of Compliance for Effluent Limitations".

b. Upon the reduction, loss, or failure of one or more of the primary sources of power to facilities utilized by the permittee to maintain compliance with the effluent limitations and conditions of this permit, the permittee shall halt, reduce or otherwise control production and/or all discharge in order to maintain compliance with the effluent limitations and conditions of this permit.

11. Removed Substances

Solids, sludges, filter backwash, or other pollutants removed from or resulting from treatment or control of wastewaters shall be disposed of in a manner such as to prevent any pollutant from such materials from entering navigable waters, or the entry of toxic or harmful contaminants thereof onto the groundwaters in concentrations or amounts detrimental to the groundwater resource.

12. Upset Noncompliance Notification

If a process "upset" (defined as an exceptional incident in which there is unintentional and temporary noncompliance with technology based permit effluent limitations because of factors beyond the reasonable control of the permittee) has occurred, the permittee who wishes to establish the affirmative defense of upset shall notify the Chief of the Surface Water Quality Division by telephone within 24 hours of becoming aware of such conditions and within five (5) days, provide in writing, the following information:

a. That an upset occurred and that the permittee can identify the specific cause(s) of the upset;

b. That the permitted wastewater treatment facility was, at the time, being properly operated;

c. That the permittee has specified and taken action on all responsible steps to minimize or correct any adverse impact in the environment resulting from noncompliance with his permit.

In any enforcement proceedings, the permittee is seeking to establish the occurrence of an upset, has the burden of proof.

13. Any requirement of this permit which is included under the unique terms of Michigan, the Water Resources Commission, Act 245, P.A. 1929, as amended, and rules promulgated thereunder, is not enforceable under the Federal Clean Water Act regulations.

B. RESPONSIBILITIES

1. Right of Entry

The permittee shall allow the Executive Secretary of the Michigan Water Resources Commission, the Regional Administrator and/or their authorized representatives, upon the presentation of credentials:

a. To enter upon the permittee's premises where an effluent source is located or in which any records are required to be kept under the terms and conditions of this permit; and

b. At reasonable times to have access to and copy any records required to be kept under the terms and conditions of this permit; to inspect any monitoring equipment or monitoring method required in this permit; and to sample any discharge of pollutants.

2. Transfer of Ownership or Control

In the event of any change in control or ownership of facilities from which the authorized discharge emanate, the permittee shall notify the succeeding owner or controller of the existance of this permit by letter, a copy of which shall be forwarded to the Michigan Water Resources Commission and the Regional Administrator.

3. Availability of Reports

Except for data determined to be confidential under Section 308 of the Act and Rule 2128 of the Water Resources Commission Rules, Part 21, all reports prepared in accordance with the terms of this permit shall be available for public inspection at the offices of the State Water Pollution Control Agency and the Regional Administrator. As required by the Act, effluent data shall not be considered confidential. Knowingly making any false statement on any such report may result in the imposition of criminal penalties as provided for in Section 309 of the Act and Sections 7 and 10 of the Michigan Act.

4. Permit Modification

After notice and opportunity for a hearing, this permit may be modified, suspended, or revoked in whole or in part during its term for cause including, but not limited to, the following:

a. Violation of any terms or conditions of this permit;

b. Obtaining this permit by misrepresentation or failure to disclose fully, all relevant facts; or

c. A change in any condition that requires either a temporary or permanent reduction or elimination of the authorized discharge.

5. Toxic Pollutants

Notwithstanding Part II, B-4 above, if a toxic effluent standard or prohibition (including any schedule of compliance specified in such effluent standard or prohibition) is established under Section 307(a) of the Act for a toxic pollutant which is present in the discharge and such standard or prohibition is more stringent than any limitation for such pollutant in this permit, this permit shall be revised or modified in accordance with the toxic effluent standard or prohibition and the permittee so notified.

6. Civil and Criminal Liability

Except as provided in permit conditions on "By-Passing" (Part II, A-9) and "Power Failures" (Part II, A-10), nothing in this permit shall be construed to relieve the permittee from civil or criminal penalties for noncompliance, whether or not such noncompliance is due to factors beyond his control, such as accidents, equipment breakdowns, or labor disputes.

7. Oil and Hazardous Substance Liability

Nothing in this permit shall be construed to preclude the institution of any legal action or relieve the permittee from any responsibilities, liabilities, or penalties to which the permittee may be subject under Section 311 of the Act except as are exempted by federal regulations.

8. State Laws

Nothing in this permit shall be construed to preclude the institution of any legal action or relieve the permittee from any responsibilities, liabilities, or penalties established pursuant to any applicable State law or regulation under authority preserved by Section 510 of the Act.

9. Property Rights

The issuance of this permit does not convey any property rights in either real or personal property, or any exclusive privileges, nor does it authorize violation of any Federal, State or local laws or regulations, nor does it obviate the necessity of obtaining such permits or approvals from other units of government as may be required by law.

10. Severability

The provisions of this permit are severable, and if any provision of this permit, or the application of any provision of this permit to any circumstances, if held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.

11. Notice to Public Utilities (Miss Dig)

The issuance of this permit does not exempt the permittee from giving notice to public utilities and complying with each of the requirements of Act 53 of the Public Acts of 1974, being sections 460.701 to 460.718 of the Michigan Compiled Laws, when constructing facilities to meet the terms of this permit.

Permit No. MI 0045179

MIXING ZONE

Facility: Ford Motor Company
Romeo Tractor and Equipment Plant
701 E. 32 Mile Road
Romeo, Michigan 48065

Outfall Number	Receiving Water	Discharge Location
003	East Pond Creek	Section 1, T4N, R12E Bruce Twp Macomb County

For toxic pollutants, the volume of receiving water used in assuring that effluent limitations are sufficiently stringent to meet Water Quality Standards is 25% of the design flow of the receiving stream.

For other pollutants, the volume of receiving water used in assuring that effluent limitations are sufficiently stringent to meet Water Quality Standards is the design flow of the receiving stream.

Ford Motor Company
Environmental and Safety
Engineering Staff

One Parklane Boulevard
Dearborn, Michigan 48126

May 28,1982

Mr. Chang Bek
Water Quality Division
Michigan Department of Natural Resources
P.O. Box 30028
Lansing, MI 48909

Subject: Ford Romeo Tractor Plant
Application for NPDES Permit

Dear Mr. Bek:

This is in response to your letter of February 19, 1982 which requested that we submit additional information so that the MDNR "can develop a BAT or a BPJ permit." As you know, the proper scope of NPDES permit application requirements has been the subject of extensive correspondence between Ford and the MDNR. See Ford letters dated October 27, 1981 (Rouge Complex) and June 16, 1981 (Rouge Complex and Sterling Axle Plant) which are incorporated by reference as if fully set forth herein. We request that these letters also be considered as to the subject permit application. As to this permit, we will complete Form 2C, Part VB.

We do not believe completion of Form 2C, Part VC, is necessary or required. Firstly, no part of federal regulations or Form 2C has been adopted by the Water Resources Commission as required by Rules 2102(2) and 2108(1). Secondly, even the federal regulations (40 CFR 122.53(d)(7)(ii)) do not require completion of Part VC where, as in this instance, discharges do not contain process wastewater. Discharges from the Romeo Tractor Plant consist of only noncontact cooling water, stormwater runoff, and groundwater infiltration. Under these circumstances, there should be no need to determine technology-based limitations for the Part VC pollutants, whether based upon BAT regulations or best professional judgment (BPJ). You will recall that this same issue arose regarding the NPDES permit for our Sterling Axle Plant. After exchange of correspondence, the MDNR requested submission of only limited analytical results.

We will complete Form 2C, Part VB, and forward to you as soon as possible. Should you have any questions regarding this matter, please contact Mr. F. P. Nixon at 313-322-3716.

Very truly yours,

A B M Houston

A. B. M. Houston, Manager
Compliance and Liaison Department
Stationary Source Environmental Control

FPN/ep
FPN

xc - R. Schraneck
J. Baldwin / WQD file

Time

TRD

February 19, 1982

Ford Motor Company
One Parklane Boulevard
Suite 628W
Dearborn, MI 48126

Attention: Mr. M. H. Manning, Vice President & General Manager
Ford Tractor Operations

RE: NPDES Permit Application
Ford Tractor & Equipment Plant
Romeo

Gentlemen:

This is in rereference to the application for a National Pollutant Discharge Elimination System Permit covering the discharge of noncontact cooling water, storm water runoff, and groundwater infiltration from the subject facility.

Staff of the Michigan Department of Natural Resources, Water Quality Division, have reviewed the application. Before they can develop a BAT or a BPJ permit, they will need additional information. Therefore, we are requesting that the Parts VB and VC (pages V-1 through V-9) of the attached form be completed and returned to this office. Should the Ford Motor Company wish to use any other forms the company may have developed, in lieu of the EPA form, that would be acceptable to us.

Your cooperation in this matter will be appreciated.

Very truly yours,

WATER QUALITY DIVISION

RECEIVED
23
FEB 1982
WATER QUALITY DIV.
DIST. 1

Chang M. Bek
Permits Section

CMB:clp
cc: R. Schrameck
K. Zollner
WQD Files

EPA Environmental NEWS RELEASE

United States
Environmental
Protection
Agency
Region V
230 S. Dearborn St.
Chicago, IL 60604

Media Contact: Virginia Donohue
(312) 886-6694
Technical Contact: Patricia Vogtman
(312) 886-3790

For immediate release: August 8, 1984

NO. 84-193

U.S. EPA FILES ADMINISTRATIVE COMPLAINT AGAINST FORD MOTOR CO. FOR HAZARDOUS WASTE VIOLATIONS

The U.S. Environmental Protection Agency (U.S. EPA) Region V today announced the filing of a civil administrative action against Ford Motor Co.

The complaint against Ford proposes a penalty of $46,200 and charges that the facility, at 701 S. 32 Mile Rd., Romeo, MI, had violated Federal regulations regarding the storage and disposal of hazardous waste.

B.G. Constantelos, director of the U.S. EPA Region V Waste Management Division, said the company was cited for violations of hazardous waste rules under the Resource Conservation and Recovery Act.

U.S. EPA is seeking the civil penalty from Ford for failing to meet specific requirements relating to ground-water monitoring, facility closure plans, and permit requirements.

Ford has the right to request that U.S. EPA hold a settlement conference or a hearing (or both) to discuss the charges. Ford must make such a request by August 31, 1984.

# # #

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION V

DATE: December 12, 1984

SUBJECT: Public Notice Comment Period
Ford Motor Company, Romeo Plant

FROM: Mike Ohm, RAIU MO

TO: D. Homer's Workload, MI Unit

This is to formally notify you that as of December 8, 1984, the comment period officially ended for the above-noted facility's Closure plan public notice. After allowing for the appropriate time period for any comments coming through the mail, please be notified that no comments have been received before the end of the comment period.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION V

DATE: February 13, 1984

SUBJECT: Ford Motor Company, Romeo Tractor Plant
MID078400165

FROM: Gary M. Westefer
RAIU

TO: David Homer
STU#1

The attached advance copy of the public notice for Ford Motor Company, Romeo Tractor Plant, 701 32 Mile Road, Romeo, Michigan, is scheduled to be published in the Romeo Observer, and the Romeo-Washington Advisor, on February 29, 1984, Romeo, Michigan.

cc: Part A File ✓
State Log

PUBLIC NOTICE

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The Ford Motor Company, Romeo Tractor Plant plan was submitted to satisfy regulations promulgated under the Resource Conservation and Recovery Act. These were published under 40 CFR 265 Subpart G, which appeared in the Federal Register January 12, 1981. The plan is evaluated by U.S. EPA according to the criteria of the regulations.

The plan and related background materials are available to the public at U.S. EPA Waste Management Branch, 230 S. Dearborn, 13th Floor, Chicago, Illinois, (312) 886-7450, from 8:30 a.m. to 4:30 p.m. Monday through Friday. These materials may also be seen at the Romeo District Library 107 Church St. Romeo, Michigan 48065, (313) 752-2291, during regular business hours.

Public comments concerning this application are requested by U.S. EPA and must be postmarked on or before March 30, 1984. Please send comments to:

United States Environmental Protection Agency
Region V
RCRA Activities
P.O. Box A3587
Chicago, Illinois 60690

Attention: Gary M. Westefer

PUBLIC NOTICE

The U.S. Environmental Protection Agency (U.S. EPA) has received a closure plan from Ford Motor Company, Romeo Tractor and Equipment Plant, Romeo, Michigan. The plan submitted on October 1, 1984, proposes the removal of wastes, cleaning and decontamination of the surface impoundments.

The Romeo facility is primarily an assembly plant for tractors and similar equipment. The type of hazardous waste to be removed consisted of wastewater treatment sludges from the electroplating operations. The proposed method for closure consists of removal of all liquids, wastes and contaminated soil from the surface impoundments, the filling of the impoundments with clean material and seeding the area over with grass.

Ford intends to continue to store hazardous waste on a short-term basis. The Romeo assembly facility will remain in operation, and its status as a generator of hazardous waste will not change.

The Ford plan was submitted to satisfy regulations promulgated under the Resource Convervation and Recovery Act. These were published under 40 CFR 265 Subpart G, which appeared in the Federal Register January 12, 1981. The plan is evaluated by U.S. EPA according to the criteria of the regulations.

The plan and related background materials are available to the public at U.S. EPA Waste Management Branch, 230 S. Dearborn, 13th floor, Chicago, Illinois, (312) 886-1657, from 8:30 a.m. to 4:30 p.m. Monday through Friday. These materials may also be seen at the Romeo Public Library, 107 Church Street, Romeo, Michigan, (313) 752-2291, during regular business hours.

Public comments concerning this application are requested by U.S. EPA and must be postmarked on or before December 8, 1984. Please send comments to:

United States Environmental Protection Agency
Region V, RCRA Activities
P.O. Box A3587
Chicago, Illinois 60609-3587
ATTN: M. Ohm

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Region V, RCRA Activities
P.O. Box A3587
Chicago, Illinois 60609-3587
ATTN: M. Ohm

Publish October 31, 1984

AFFIDAVIT OF PUBLICATION

US EPA

PRINTER'S BILL

12"

1 Times, 31.80

Notary, 3.00

Total $ 34.80

STATE OF MICHIGAN,

County of Macomb, ss.

Melvin E. Bleich

he

being duly sworn deposes and says, that ..... is one of the printers of THE ROMEO OBSERVER, a newspaper printed, published and circulated in the County of Macomb, in said State, that the annexed printed notice was duly published in said newspaper and that the first publication thereof was on the 31 day of Oct A.D. 19 84, and the last publication thereof was on the .....

day of ..... A.D., 19.....

Melvin E Bleich

Subscribed and sworn to before me this 31 day of Oct A.D., 19 84

Gloria M Watts

Notary Public for Macomb County, Michigan

My Commission expires .....

GLORIA M. WATTS
Notary Public, Macomb County, MI
My Commission Expires Aug. 31, 1985

STATEMENT

THE ROMEO OBSERVER

ESTABLISHED 1866

124 West St. Clair, P.O. Box 96 (313) 752-3524

ROMEO, MICHIGAN 48065

DATE NOV 2 1984

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U.S. EPA - Region V
RCRA Activities
P.O. Box A3587
Chicago, ILL 60690

Attention: Gary M. Westefer

DATE 1984	DESCRIPTION		DEBIT	CREDIT	BALANCE
Feb 29	14" Pub Not		37.10		
	Affidavit		3.00		40.10
Apr 4		SC	.60		40.70
May 4		SC	.61		41.31
May 11	Recd			41.31	-0-
Oct 31	12" Dis.		31.80		
	Affidavit		3.00		34.80

RECEIVED
NOV 05 1984
WMD·RAIU
EPA, REGION V

Pay Last Amount in this Column

PUBLIC NOTICE

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United States Environmental Protection Agency
Region V
RCRA Activities
P.O. Box A3587
Chicago, Illinois 60690

Attention: Gary M. Westefer, 5HW

Publish Advisor: 2-29-84

AFFIDAVIT OF PUBLICATION
State of Michigan
County of Macomb, s.s.

Lynn R. McCarthy

Being duly sworn deposes and says, that he is an agent of the publisher of THE ADVISOR NEWSPAPERS, a newspaper printed, published and circulated in the County of Macomb, in said State, and that he has knowledge that the annexed printed notice was published in said newspaper at least once in each week for one successive week.

The first publication thereof was on the 29 day of Feb A.D. 1984

and the last publication thereof was on the 29 day of Feb A.D. 1984

Subscribed and sworn to before me this 29 day of Feb A.D. 1984

Priscilla Agnes Wolfe
NOTARY PUBLIC FOR MACOMB COUNTY, MICHIGAN

My commission expires 3/18/86

AFFIDAVIT OF PUBLICATION

US EPA

STATE OF MICHIGAN,
County of Macomb, ss.

Melvin E. Bleich,

being duly sworn deposes and says, that he is one of the printers of THE ROMEO OBSERVER, a newspaper printed, published and circulated in the County of Macomb, in said State, that the annexed printed notice was duly published in said newspaper and that the first publication thereof was on the 29 day of Feb A.D. 1984, and the last publication thereof was on the ..... day of ..... A.D., 19.....

Melvin E Bleich

Subscribed and sworn to before me this 29 day of FEb A.D., 1984

Gloria M Watts

Notary Public for Macomb County, Michigan

My Commission expires .....

GLORIA M. WATTS
Notary Public, Macomb County, MI
My Commission Expires Aug. 31, 1986

PRINTER'S BILL

14"

1 Times, 37.10
3.00

Notary, ...

Total $ 40.10

a Resolution

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United States Environmental Protection
Agency
Region V
RCRA Activities
P.O. Box A3587
Chicago, Illinois 60690

Attention: Gary M. Westefer, 5HW

A.1.3

$1.8 billion from Ford bolsters Michigan

By JOSEPH SZCZESNY
Press Automotive Editor

Ford Motor Co. said Thursday it invested more than $1.8 billion last year renovating or expanding plants in southeastern Michigan as the automaker's string of recent successes bolstered the state's economy.

Key capital improvement projects included the continuing modernization of the company's assembly plant in Wixom and the start of construction of a new $165 million stamping plant in Wayne, Ford officials said.

Last August, Ford committed $238 million to the construction of a 614,000-foot addition to the Wixom plant as part of the company's expansion plans. It was the third expansion at the plant since 1985.

In addition, Ford put more than $1 billion toward remodeling, retooling and retraining the work force at the former Romeo tractor plant, which is being converted into an ultramodern engine plant, Ford officials said.

Another $200 million was pledged to refurbish the Mustang assembly plant in Dearborn and another $208 million will go to expand a transmission plant in Livonia.

Ford and various subsidiaries such as Rouge Steel purchased more than $3.6 billion in goods and services in Michigan last year and paid its 97,000 employees in the state more than $4.2 billion in wages and salaries. Approximately $338 million of the total was distributed in the form of profit-sharing from the company's record profits, the Ford report on community activities noted.

Ford also paid out more than $107 million in local property taxes in Michigan and its employees chipped in with another $196 million in state income taxes.

The automaker also contributed more than $11 million to various civic, cultural, educational activities in the state, including a corporate donation of $1.3 million — the largest ever — to the Detroit area United Fund.

Ford also said its 33 Ford-brand dealers in the Detroit area boosted their sales by 12 percent last year and the 16 Lincoln-Mercury dealers in the Detroit reported their sales increased by 7 percent.

Ford committed $238 million to the construction of a 614,000-foot additio to the Wixom plant

THE OAKLAND PRESS
BUSINESS
FRIDAY MARCH 10 1989 PAGE B-6

Ford plans $900 million Romeo retool

Staff and wire reports

DEARBORN — Ford Motor Co. plans to spend $900 million to retool its Romeo tractor plant and begin producing a new line of engines there by mid-1990, the company announced Monday.

Ford has completed feasibility studies on the project and will begin conversion of the 1.4-million-square-foot plant in mid-1988, said Louis Ross, executive vice president for Ford's North American operations.

Ross said the cooperation of UAW Region 1B and UAW Local 400 of Utica played a significant role in Ford's decision to modernize the plant.

In May, Chairman Donald E. Petersen said Romeo was a leading candidate for the engine high-tech project, which he added would be a major boon to the state and the entire Detroit metropolitan area.

The company plans to end tractor production at the plant in the first part of 1988 and move the work to another plant in Western Europe.

Ford currently employs approximately 675 hourly and 175 salaried workers at the Romeo plant, which originally was built in 1974 and at one time had a workforce of approximately 3,000.

However, tractor sales have nosedived after 1979 and never have recovered. The plant has been operating at only about one-third of its capacity.

Bert Serre, a Ford spokesman, said the company would not release details on the type or number of engines to be produced at the converted plant.

However, the $900 million will include planning, engineering, training for the engine program, plant conversion and tooling, Ross said.

Ford considers plant renovation

By JOSEPH SZCZESNY
Press Automotive Editor

Ford Motor Co. is eyeing a $900 million renovation of a manufacturing plant just outside the northern Macomb County community of Romeo.

Donald E. Petersen, Ford's chairman, told shareholders at the company's annual meeting Thursday that no final decision had been made on whether to go ahead with the remodeling of the Romeo plant.

"A first look suggests that with cooperation of state and local government agencies we may be able to convert ... the plant ... into a state-of-the art engine plant for a new line of engines that we will need within the next five years," Petersen said.

More than $900 million may go into the engine program and plant for planning, engineering and training, he said.

"It would be good news for employees and for southeast Michigan, if the results of our feasibility studies support our preliminary findings."

The renovation of the Romeo plant would be only one part of a larger capital spending program for new products and for plant modernization Ford has planned for the next five years, Petersen said.

Petersen said the capital spending was part of Ford's overall commitment to build "appealing products, an attractive and stable working environment and a healthy return on the investment of our stockholders."

At a press conference after the meeting, Petersen refused to go beyond saying the Romeo project was under serious consideration or to say how many jobs it might create.

Ford said last November it planned to phase out the tractor operations now occupying the plant by 1988 and move the work to another factory it owns in Western Europe.

The Romeo plant's payroll includes 675 hourly and 175 salaried employees.

The plant originally was built in 1974. In the late 1970s, it had a payroll of more than 3,000 assigned to it.

Its work force dwindled after tractor and agricultural equipment sales went into a nose dive in the last recession.

The plant never recovered and is now operating at only 35 percent of its capacity.

BUSINESS
The Oakland Press
Friday, May 15, 1987

Romeo tractor plant to close

BUSINESS
The Oakland Press
Wednesday, November 12, 1986

Staff and wire reports

The Ford Motor Co. will phase out operations at its tractor plant in Romeo by 1988, eliminating more than 800 jobs in the process.

The work at the plant, the last factory in the United States to build small tractors, will be transferred to Europe to cut costs, Ford said Tuesday.

The plant opened in August 1974, after work was shifted from Ford's original assembly plant in Highland Park. It employs 650 hourly and 175 salaried employees, Ford spokesman Rod Sieb said.

The closing is not related to other recently reported Ford cutbacks in future projects relating to new or redesigned cars, Sieb said.

In the two-part phase-out, agricultural tractor production will be transferred to Ford's plant in Basildon, England, sometime next year, and industrial tractor production will be shifted to an undetermined plant in Europe by the end of 1988, Sieb said.

The Romeo plant, which has been running at 35 percent capacity but once employed more than 3,000 workers, is more expensive and less efficient than comparable plants in Europe.

No figures were available on how much Ford will save by transferring its tractor operations overseas, Sieb said.

Robert Moglia, vice president and general manager of Ford Tractor operations, met with employees at the plant Tuesday morning to explain their options.

"We're going to try first of all to place people at other Ford locations," Sieb said.

Salaried employees also will be offered voluntary early retirement and special retirement options, use of professional counseling and placement services, and voluntary termination programs.

Hourly workers will be covered by benefits in the Protected Employee Program under the Ford-United Auto Workers union agreement and will be offered voluntary retirement or termination options.

Ford still undecided on tractor plant fate

By Marjorie Sorge
News Staff Writer

Ford Motor Co. is expected to decide before year-end whether to close its Romeo tractor plant and move the production to France, the company confirmed Tuesday.

Ford said that tractor sales are off so much that it will be forced to lay off between 130 and 160 workers indefinitely on Oct. 13.

A company spokesman said the "layoffs are strictly a volume reduction move and reflect the state of the tractor business" and are "unrelated to other matters that might affect the plant."

Local 400 president Joe Peters said, however, that "Ford may be saying it is (planning layoffs) because of volume decreases, but I say it is (because of) outsourcing."

The future of the Romeo plant has been in doubt because of falling sales in the tractor market. The tractor industry has lowered it expected 1986 sales from 160,000 units to 152,000. Ford will not estimate its tractor sales.

Ford recently shared with the UAW the results of a study on the plant's future, begun in 1985. The plant makes three-cylinder tractors for farming.

Company executives will now decide if Ford will make a "substantial" investment in the Romeo plant, which has about 800 hourly and 180 salaried workers, or shift the work to the operations in Charleville, France.

Peters said the UAW has tried to give Ford alternatives and offered to make concessions. But the company is not interested in listening and "that leads me to believe they have made up their minds," he said.

Peters said he does not realistically expect a decision on the plant's future until spring.

The Ford spokesman said the company is unaware of any specific concession offers by the UAW.

According to Peters, Ford has told the UAW it can build the tractors for $16.00 an hour (wages and benefits) in France, compared with $32.00 an hour in Romeo.

The Ford spokesman said the company is unfamiliar with those dollar figures, adding that there does exist a "significant difference in labor costs between the two countries."

The UAW is also concerned about the future of the Romeo workers because the Ford tractor operations will become on Jan. 1 a new Ford subsidiary, Ford New Holland, Inc.

There is concern that the Romeo workers could lose their preferential hiring and protected employe program (PEP) rights because of the new subsidiary status. PEP prohibits Ford from laying off workers with high seniority due to new technology or the movement of work.

The Ford spokesman said the plant is covered under the current Ford/UAW national agreement, which covers those areas.

The Detroit News
Wednesday, September 24, 1986

Ford to form new tractor subsidiary

By Marjorie Sorge
News Staff Writer

Ford Motor Co. said Wednesday it will reorganize its tractor operations in the United States into a wholly-owned subsidiary, a move which would give the operation more autonomy from the parent company.

The move, to take effect Jan. 1, 1987, further integrates the old Ford tractor business and its New Holland business, which it acquired from Sperry Corp. in October 1985 for $330 million.

Robert F. Moglia, Ford vice president and general manger of Ford tractor operations, will be president of the new company, to be called Ford New Holland Inc.

That new subsidiary will be made up of tractor operations in the United States and overseas.

The British operation will be called Ford New Holland, Ltd. Overseas operations in France, Belgium, Brazil and Australia will be reorganized at a later date.

There are also plants in Pennsylvania and in Romeo, Mich.

"(The reorganization) gives this new and stronger combination of Ford Tractor and New Holland the ability to take advantage of good business growth opportunities as they arise," Moglia said.

There are no acquisitions on the horizon, but the company will "look at opportunities that come along," a company spokesman said.

The new company has about 18,000 employes and annual revenues of about $2 billion.

Before the purchase of New Holland, Ford tractor had about 9,000 employes and average annual revenue of $1.3 billion over the last five years.

The Detroit News
Thursday, June 19, 1986
Business News/222-2738
Home Delivery/222-NEWS
Classified Ads/977-7500

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DETROIT, MI
DETROIT NEWS
E - 633,708 - S 826,11

NOV-22-84

Ford faces denial of emission permits

By Dudley K. Pierson
News Lansing Bureau

LANSING — The Michigan Air Pollution Control Commission is being urged to deny Ford Motor Co. two emission permits at its Utica Trim Plant, without which the company said it might have to transfer "several thousand" jobs out of state.

But Ronald Skoog, director of the state Department of Natural Resources (DNR), said yesterday, "We're very close to resolving the issue," after negotiating with company officials. "I'm hoping. ... I feel as though we will resolve it."

The company employs about 3,000 workers at the Utica Trim Plant on Mound Road where it plans to install production lines for manufacturing cloth panels for a new Aerostar mini-van and Taurus car.

THE PERMITS for both processes are to cover emissions of up to an estimated 399 tons per year of volatile organic compounds associated with production of the Aerostar and Taurus vehicles panels.

A DNR staff report to the commission recommends that it deny Ford the two new permits, citing Ford's noncompliance with local, state and federal air quality regulations at three other plants.

"It's damn near a catastrophe," said one Ford official, who did not want to be named. "This whole thing is just crazy."

Skoog, who described the impasse as a "serious issue," met with Ford and agency representatives yesterday in efforts to negotiate a solution. He said the commission might delay a decision by striking the matter from its Tuesday agenda.

THE RATIONALE for denying the two permits lies with an administrative rule of the commission which, according to the staff report, requires the commission "to deny a permit to install application for a major offset source unless 'All existing sources in the state owned or controlled by the owner or operator of the proposed source (are) in compliance with all applicable local, state, and federal air quality regulations ... a consent order or other legally enforceable agreement specifying a schedule and timetable for compliance.'"

Skoog conceded that denying the permits would have a "significant impact on the Detroit area."

Ford spokesman Jim Allan was unsure what the impact would be on Utica Trim Plant jobs if the permits were denied. But another Ford official, who asked not to be named, said if the permits are denied, the company might have to move some of its operations out of state in order to begin the Aerostar and Taurus panel production.

He said the company plans to sell the vehicles next spring and has little time to gear up production elsewhere in the state.

JONATHON TROUT, of the DNR Air Quality Division staff, said that according to federal and state administrative rules, the DNR staff had no option but to recommend denying the permits.

The three Ford plants cited in the report as being not in compliance with local, state or federal air quality regulations are the Rouge Steel Co., the Mt. Clemens Vinyl Trim Plant and the Romeo Tractor Plant.

Circ JSA/HMS (no attachment)
VHS

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Schedule Number:	11-17

Environmental and Safety Engineering Staff
Ford Motor Company

One Parklane Boulevard
Dearborn, Michigan 48126

MID 078 400 165

Mr. Wendel L. Miser
Ecologist
Waste Identification Branch
Office of Solid Waste (WH-562)
U.S. Environmental Protection Agency
401 M Street, S.W.
Washington, DC 20460

March 5, 1984

RECEIVED
JUN 10 1986
HAZARDOUS WASTE DIV.

Subject: Phosphate Coating Delisting Petition
Ford Romeo Tractor Plant (#0521)

Dear Mr. Miser:

Attached is a portion of the supplementary information you requested from us in your letter of March 1, 1984 to Mr. V. H. Sussman. The items we have addressed in this response correspond to those you indicated in our previous telephone conversation as being pertinent to your evaluation of a temporary exclusion. The responses bear the same numbers as the associated requests contained in the March 1 letter.

We trust that you now have sufficient information regarding the wastewater treatment sludge from this facility to proceed with approval of a temporary exclusion. If not, please contact me (313/322-8852) for any further information you may require. We would appreciate your expediting your review and approval of our request.

J. M. Reinke
Manager, Survey & Compliance
Assurance
Stationary Source Environmental
Control Office

keb/j
8/27

Attachment

bcc: L. J. Chiatalas
G. Kircos
J. Moosekian
J. Van De Kerckhof
S. H. Vaughn

Supplemental Information for Delisting
Ford Romeo Tractor Plant

1. A description of the waste disposal procedures used prior to November 19, 1980; those procedures used from November 19, 1980 to the present; and those procedures proposed for the future if the waste is delisted.

Prior to 11/19/80:	All waste treatment plant sludge was treated as a hazardous waste and disposed of at Wayne Disposal Inc.
11/19/80 - 6/24/82:	All waste treatment plant sludge was treated as a hazardous waste and disposed of at Wayne Disposal Inc.
6/24/82 - 7/20/83:	All waste treatment plant sludge was treated as a non-hazardous waste and disposed of at South Macomb Disposal Authority.
7/20/83 - present:	All waste treatment plant sludge was treated as hazardous waste and disposed of at Wayne Disposal Inc.
If delisted:	Waste treatment plant sludge will be treated as a non-hazardous waste and disposed of accordingly.

8/13
keb/j

Supplemental Information for Delisting
Ford Romeo Tractor Plant

2. A statement verifying that the number of samples collected and analyzed is representative of any variation in constituent concentrations in the waste over time.

Lagoon Sampling

The west lagoon has not been cleaned since the onset of its use in 1974. The east lagoon was cleaned out partially in 1981. Both the east and west lagoons contain wastes representing variations in plant operations for years past. An effort was made to collect valid, representative samples from both lagoons. The petitioner believes that the number of samples collected and analyzed is representative of the constituent concentrations in the waste over time.

Cetrifruge Samples

The petitioner believes that, due to the duration of the survey and the weekly cycle of the "electroplating" processes, the number of samples collected and analyzed is representative of any variation in constituent concentrations in the waste over time.

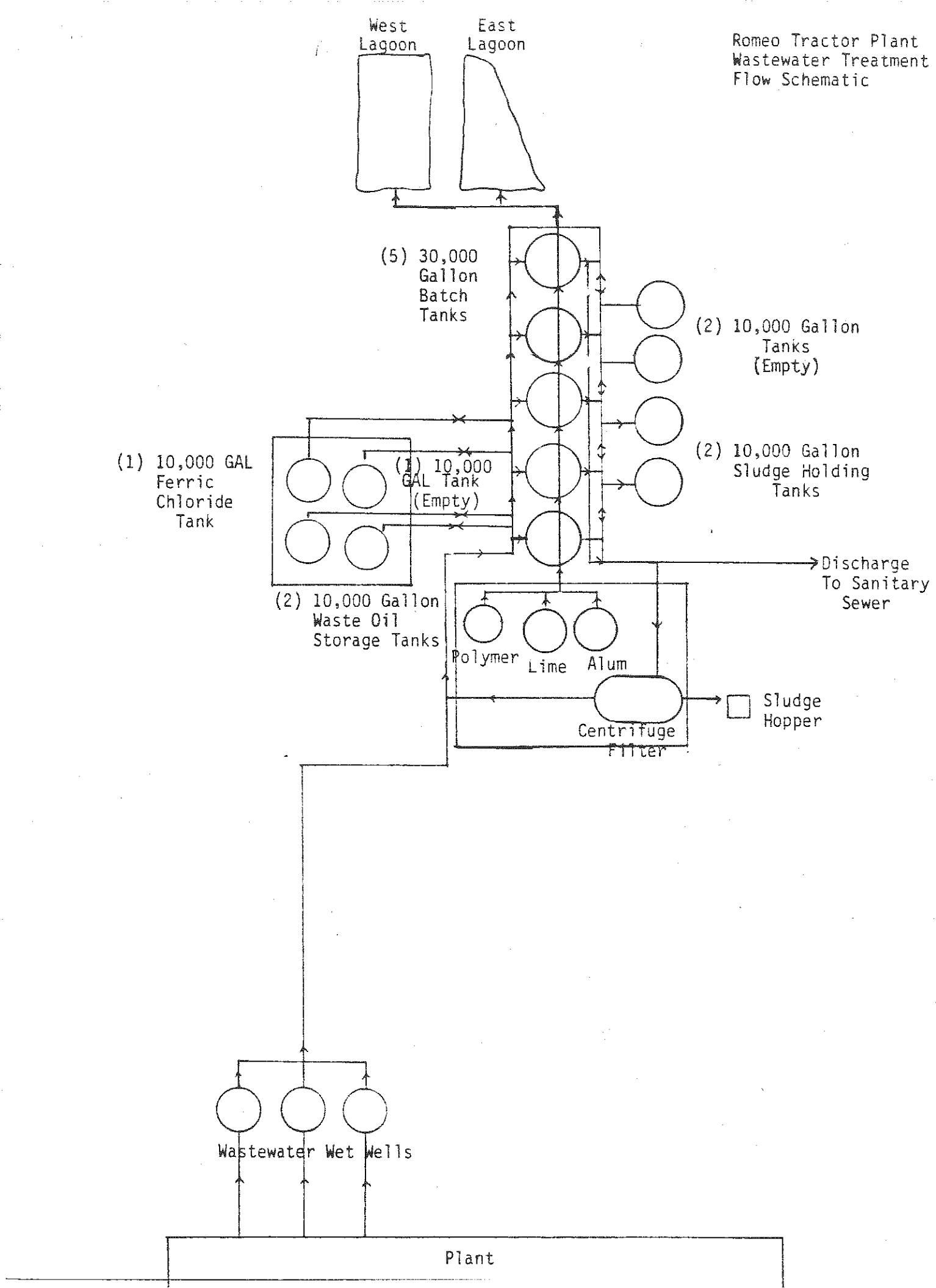
8/14
keb/j

Supplemental Information for Delisting
Ford Romeo Tractor Plant

7. A detailed schematic diagram of the wastewater treatment system (Industrial Waste Pretreatment Plant).

   The requested schematic is presented on the following page.

8/15
keb/j


West Lagoon
East Lagoon
Romeo Tractor Plant
Wastewater Treatment
Flow Schematic
(5) 30,000 Gallon Batch Tanks
(2) 10,000 Gallon Tanks (Empty)
(2) 10,000 Gallon Sludge Holding Tanks
(1) 10,000 GAL Ferric Chloride Tank
(1) 10,000 GAL Tank (Empty)
(2) 10,000 Gallon Waste Oil Storage Tanks
Discharge To Sanitary Sewer
Polymer
Lime
Alum
Sludge Hopper
Centrifuge Filter
Wastewater Wet Wells
Plant

Supplemental Information for Delisting
Ford Romeo Tractor Plant

12. Dates of analysis for samples collected for the original petition...

The dates of analyses for the samples associated with the petition as originally filed are presented in the table on the following page.

8/16
keb/j

Delisting Petition Dates of Analyses
Ford Romeo Tracto. Plant (#0516)

All dates pertain to 1983

Date Sampled	Sample Location	Sample as Received			Sample as Leachate	
		Total Cyanide	Total Metals	% Solids	Leaching	Metals
5/31/83	W. Lagoon Sludge Unit 1	6/21-23	7/28-8/1	6/14	6/14-15	7/7-15
5/31/83	W. Lagoon Sludge Unit 6	6/23-24	6/29	8/8-10	6/22	6/29-7/8
5/31/83	W. Lagoon Sludge Unit 7	6/23-24	6/29	8/8-10	6/22	6/29-7/8
5/31/83	W. Lagoon Sludge Unit 10	6/23-24	6/29	8/8-10	6/22	6/29-7/8
5/31/83	E. Lagoon Sludge Unit 1	6/23-27	6/29	8/8-10	6/22	6/29-7/7
5/31/83	E. Lagoon Sludge Unit 2	6/23-28	6/29	8/8-10	6/22	6/29-7/7
5/31/83	E. Lagoon Sludge Unit 3	6/27-29	6/29	8/8-10	6/22	6/29-7/7
5/31/83	E. Lagoon Sludge Unit 5	6/27-29	6/29	8/8-10	6/22	6/29-7/7
6/2/83	WTP Centrifuge Sludge w/o PO_4	7/5-7	7/7	8/8-10	6/29	7/7-8
6/8/83	WTP Centrifuge Sludge w/o PO_4	7/5-11	7/7	8/8-10	6/29	7/7-8
6/18/83	WTP Centrifuge Sludge w/o PO_4	7/5-12	7/7	8/8-10	6/29	7/7-8
6/21/83	WTP Centrifuge Sludge w/o PO_4	7/27-29	8/2	8/8-10	7/27	8/2
6/7/83	WTP Centrifuge Sludge w/PO_4	7/27-29	8/2	8/8-10	7/27	8/2
6/19/83	WTP Centrifuge Sludge w/PO_4	7/27-29	8/2	8/8-10	7/27	8/2
6/20/83	WTP Centrifuge Sludge w/PO_4	7/27-29	8/2	8/8-10	7/27	8/2
8/2/83	WTP Centrifuge Sludge w/PO_4	8/2-16	8/2-16	8/8-10	8/8	8/9-16

Notes: w/o PO_4: Sludge sample containing minimum PO_4 waste.
w/PO_4: Sludge sample containing maximum PO_4 waste.

8/17
keb/j

Supplemental Information for Delisting
Ford Romeo Tractor Plant (#0521)

Statement regarding the use of cadmium, chromium, and nickel in the "electroplating" processes discharging wastewater to the Industrial Wastewater Pretreatment Plant.

Cadmium, chromium, and nickel are not used in the plant's phosphate coating and tin immersion plating processes.

8/27c
keb/j

Larry Au Buchon

V. H. Sussman, Director
Stationary Source Environmental Control
Environmental and Safety Engineering

Ford Motor Company
One Parklane Boulevard
Dearborn, Michigan 48126

January 17, 1984

Mr. Matthew A. Straus, Manager
Waste Definition Program
Office of Solid Waste (WH-565B)
U.S. Environmental Protection Agency
401 M Street S.W.
Washington D.C. 20460

Subject: Phosphate Coating Delisting Petitions

Reference: Our December 15, 1983 Meeting at EPA

Dear Mr. Straus:

The purpose of this letter is three-fold: (1) to summarize the results of the December 15, 1983 meeting we attended with you and your staff in Washington to discuss the status of our 12 pending delisting petitions and to urge you to process our delisting petitions pursuant to current regulations, (2) to advise you of the course of action we intend to pursue, and (3) to request your assistance, if necessary, in facilitating attainment and/or modification of RCRA Interim Status at 8 of the 12 Ford Motor Company plants whose delisting petitions remain pending.

Status of Petitions and Request to Process Petitions

You indicated that examination of our 12 petitions to date has not revealed any information that would lead EPA to turn down our requests for non-hazardous designation by EPA. You also informed us that you intend to ask for additional data not currently required by the regulations to assess whether there are any hazardous constituents other than those for which listing was first made. We understand that this request is in anticipation of Congressional action to amend RCRA.

It is our opinion that you are obligated by current regulations to review our petitions without the additional data. We urge you to do so promptly. In this regard, we suggest that you consider granting a "temporary exclusion" under 40 CFR 260.22 (m) until it is determined what Congressional action is taken. We would provide you with the additional analytical data you request, consistent with anticipated Congressional modification to the delisting criteria, which would later serve as a basis

for "final delisting" on a plant-by-plant basis. Early EPA action on our pending petitions -- however tentative or qualified the result -- could represent enormous potential cost savings to Company plants, which in some cases must now ship its "non-hazardous hazardous wastes" hundreds of miles to effect lawful disposal pursuant to RCRA.

Course of Action/Supplemental Information Requests

Recognizing the absence of statutory authority and that the agency has promulgated no new regulations, standards, procedures, or other written criteria to evaluate the supplemental data we have been asked to provide, we appreciate your suggestion that we begin by focusing on one or two typical plants and -- following further discussion with EPA -- proceed with our testing on a "step-by-step" basis. After reviewing our findings with EPA as each round of tests is performed, it will be determined if additional tests are needed and what direction they should take. The remaining delisting petitions can then be amended following application of the lessons learned on the first one or two processed. We intend to start the first round of the requested supplemental testing by conducting a "chemical inventory" at the plants selected, to enable preparation of a testing protocol which will specify both the parameters of interest and the test procedures to be utilized. Later this month Mr. J. M. Reinke of this Office will be contacting your staff to identify the plants selected and review our initial plan of action.

Interim Status

As discussed during our meeting in Washington, we are prepared to follow the parallel course of compliance with RCRA Interim Status while the delisting petitions are processed. Consistent with the provisions of November 22, 1983 Federal Register (48 FR 52718-20), we request your assistance, if necessary, in authorizing the eight Ford plants affected to prepare and submit appropriate RCRA Part 'A' documents and implement corresponding interim status requirements applicable to hazardous waste treatment/storage/disposal facilities. Because these eight facilities were all in existence on November 19, 1980 (the effective date of the RCRA regulations), we believe that they are eligible for appropriate RCRA interim status. As you are now well aware, our request is based on the considerable confusion that has existed over the definition of "electroplating" and EPA's subsequent inclusion in the development document of "phosphating"

and "conversion coating" as part of the listing of F006 waste (wastewater treatment sludge from electroplating operations). With your concurrence, appropriate Part 'A' applications (be they new or modified) would be prepared/submitted to the appropriate EPA Regional Office not later than April 30, 1984.

Although we are prepared to follow this parallel course of action, it would not be necessary if EPA grants the "temporary exclusions" promptly. Thank you again for agreeing to meet with us last month. The advice you provided was of considerable assistance in developing the above proposals.

Very truly yours,

JSA/vr

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

V. H. Sussman, Director
Stationary Source Environmental Control
Environmental and Safety Engineering

Ford Motor Company
One Parklane Boulevard
Dearborn, Michigan 48126

Administrator
U.S. Environmental Protection Agency
c/o Office of Solid Waste (WH-565)
401 M Street, S.W.
Washington, DC 20460

August 19, 1983

Subject: Petition for Delisting
Ford Romeo Tractor Plant
EPA ID No. MID078400165

Dear Sir:

Transmitted herewith pursuant to the requirements of 40 CFR 260.20 and 260.22 is a certified Petition for Delisting covering wastewater treatment sludge generated at the above-referenced facility.

Please note that this submittal is part of the effort coordinated by the Motor Vehicle Manufacturers Association of the United States (MVMA), and relates to phosphate coating wastewater treatment sludge generated by integrated automotive manufacturing facilities common among dozens of plants of MVMA member companies throughout North America. Accordingly, we request that EPA review this petition as provided by applicable federal hazardous waste management regulations, in conjunction with the industry-wide effort that was undertaken following consultation with the EPA Office of Solid Waste. References: (1) October 1, 1982, MVMA-EPA Meeting in Washington, D.C., (2) November 8, 1982 letter from Mr. David Friedman to MVMA, (3) January 27, 1983 MVMA response to EPA.

As we have mentioned to EPA previously, the phosphate coating processes we utilize employ no cyanides and no electric current is applied. We believe that the test results and other documentation submitted with this Petition support our view that these wastes do not exhibit hazardous characteristics and should not be considered RCRA hazardous wastes. It is also our view that these wastes are not capable of posing substantial present or potential hazard to human health or the environment.

Consistent with provisions of 40 CFR 260.22(m) of the regulations, we believe that a sufficient case has been presented to EPA to conclude "that there is a substantial likelihood that an exclusion will be finally granted." A determination by EPA for a "temporary exclusion" is therefore urged to enable the plant to dispose of these sludges as non-hazardous solid wastes at the earliest possible date. Accordingly, we request your early review and approval of this petition.

Very truly yours,

/jb

Attachment

Petition for Delisting

(Reference: 40 CFR 260.22)

Petitioner:

Ford Motor Company
c/o Stationary Source Environmental Control Office
Mr. Victor H. Sussman, Director
Suite 628 W. Parklane Towers
1 Parklane Blvd.
Dearborn, MI 48126

Affected Facility:

Ford Motor Company Romeo Tractor Plant
701 E. 32 Mile Road
Romeo, MI 48063
EPA I.D. No. MI0078400165

Proposed Action:

To exclude petitioner's wastewater treatment sludge from classification as the listed hazardous waste, F006 ("Wastewater Treatment Sludge from Electroplating Operations").

Petitioner's Interest:

The petitioner, being the generator and storer of the subject sludge, has a direct interest in the outcome of the proposed action. Disposal of these sludges as hazardous waste will result in the plant incurring considerable unnecessary expense.

Statement of Need and Justification:

Test results indicate the petitioner's sludge is not EP-toxic and does not possess other hazardous waste characteristics.

A non-hazardous classification of the sludge will result in a significant reduction in disposal, monitoring and any future closure costs.

SUPPORTING INFORMATION
PETITION FOR DELISTING
ROMEO TRACTOR AND EQUIPMENT PLANT

Process Description

The Romeo Tractor and Equipment Plant manufacturers and paints component parts used for tractor assembly. The standard Industrial Classification of the the facility is 3530.

The facility is an integrated manufacturing facility which includes machining, grinding, stamping, welding, cleaning, painting, assembly and testing operations. Included in the painting operation is a phosphate coating step where bare metal parts are phosphate coated to prepare the metal surface for paint application.

The flow from the phosphate operations, and all other manufacturing operations, is collected at the plant waste treatment facility and pretreated prior to discharge to the Village of Romeo Municipal Sanitary Sewer. Refer to Figure 1 for a schematic flow diagram of the plant wastewater flows.

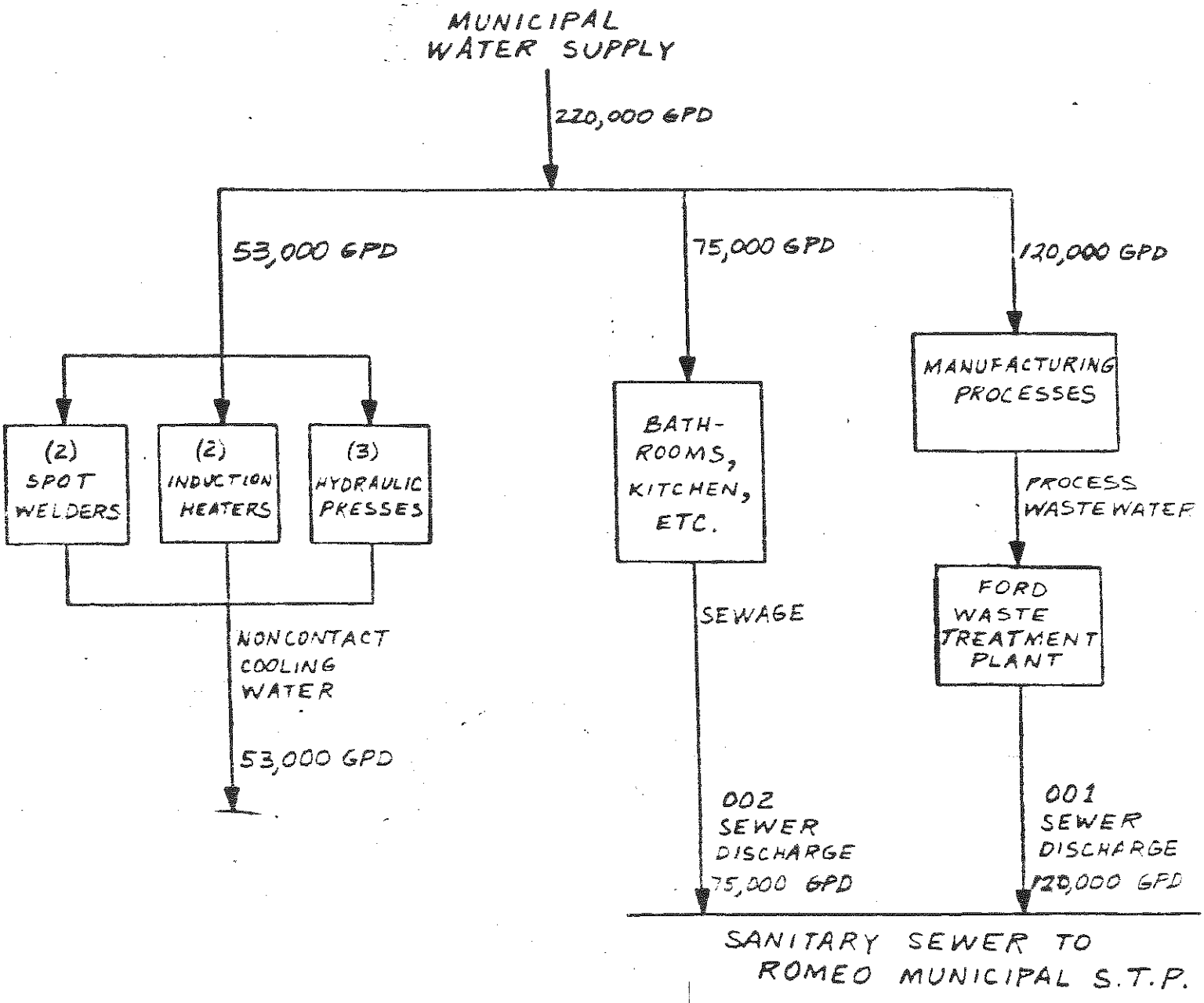
The flow through the process wastewater treatment plant is approximately 120,000 gpd; of that 75,000 gpd is discharged from the phosphating systems. Figure 2 represents the wastewater flow from the phosphate coating operations to the treatment plant. The phosphate processes operate eight (8) hours per day, five (5) days per week. Figure 3 depicts each phosphate process and lists the dumping frequency used for the various stages. The phosphate operations do not employ any use of cyanide nor is any electric current applied.

All plant process and oily wastewaters drain by gravity to a wetwell from which it is pumped into one of five (5) 30,000 gallon batch treatment tanks. Wastewater treatment includes the addition of alum or ferric chloride to adjust the pH. The batch tank is then mixed for 10 to 15 minutes, and a hydrate lime slurry is added to return the pH to the desired 7-8. A polymer is then added for solids settling; one to two hours is normally allowed. The liquid sludge is removed from the bottom of the batch tank and transferred to a sludge holding tank. From there it is dewatered through a centrifuge filter. Approximately 20 yards of sludge from the centrifuge is accumulated monthly in a hopper and removed by a licensed contractor to a landfill. The water removed by the centrifuge is recirculated to the wetwell for retreatment. The clear effluent is then discharged from the bottom of the batch tank to the municipal sewer. Frequently a layer of oil will remain in the batch tank after all the clear effluent has been removed. This oil layer is pumped to an oil storage tank located on site.

The facility has two lagoons located near the wastetreatment plant that were originally installed for the storage of waste oil and sludge from the treatment process. The plant now has the capability to move the oil directly from the batch tank to a waste oil storage tank. The lagoons now are used to hold excess wastewater that can not be handled directly by the treatment plant or to dilute strongly contaminated wastewater so it can be treated more effectively at a later time. The west lagoon has not been cleaned since the onset of its use in 1974. The east lagoon was cleaned out partially in 1981. The lagoons are occasionally skimmed for oil and excess wastewater is pumped off and recirculated to the treatment tanks.

The sludge from the treatment plant operations and in the lagoons is the subject of this petition. In accordance with the understanding reached with Mr. Myles Morris, USEPA Office of Solid Waste regarding what constitutes F006 sludge (Ref: J. M. Reinke letter dated March 10, 1983), the waste oil removed during wastewater treatment is not F006. Because sludge from the treatment of the "electroplating" (phosphate coating) rinsewaters is formed concurrently with (and is thereby comingled with) the sludge from treating remaining wastewaters, the EPA has advised the sludge must be considered a "listed" hazardous waste, i.e., F006.

SCHEMATIC OF WATER FLOW
FORD ROMEO TRACTOR AND EQUIPMENT PLANT



Note:

These figures require revision.

53000 + 75000 + 120000 ≠ 220,000 gpd

Jeff J.
9/8/92

Figure

Wastewater Flow Schematic
Ford Motor Company
Romeo Tractor & Equipment Plant

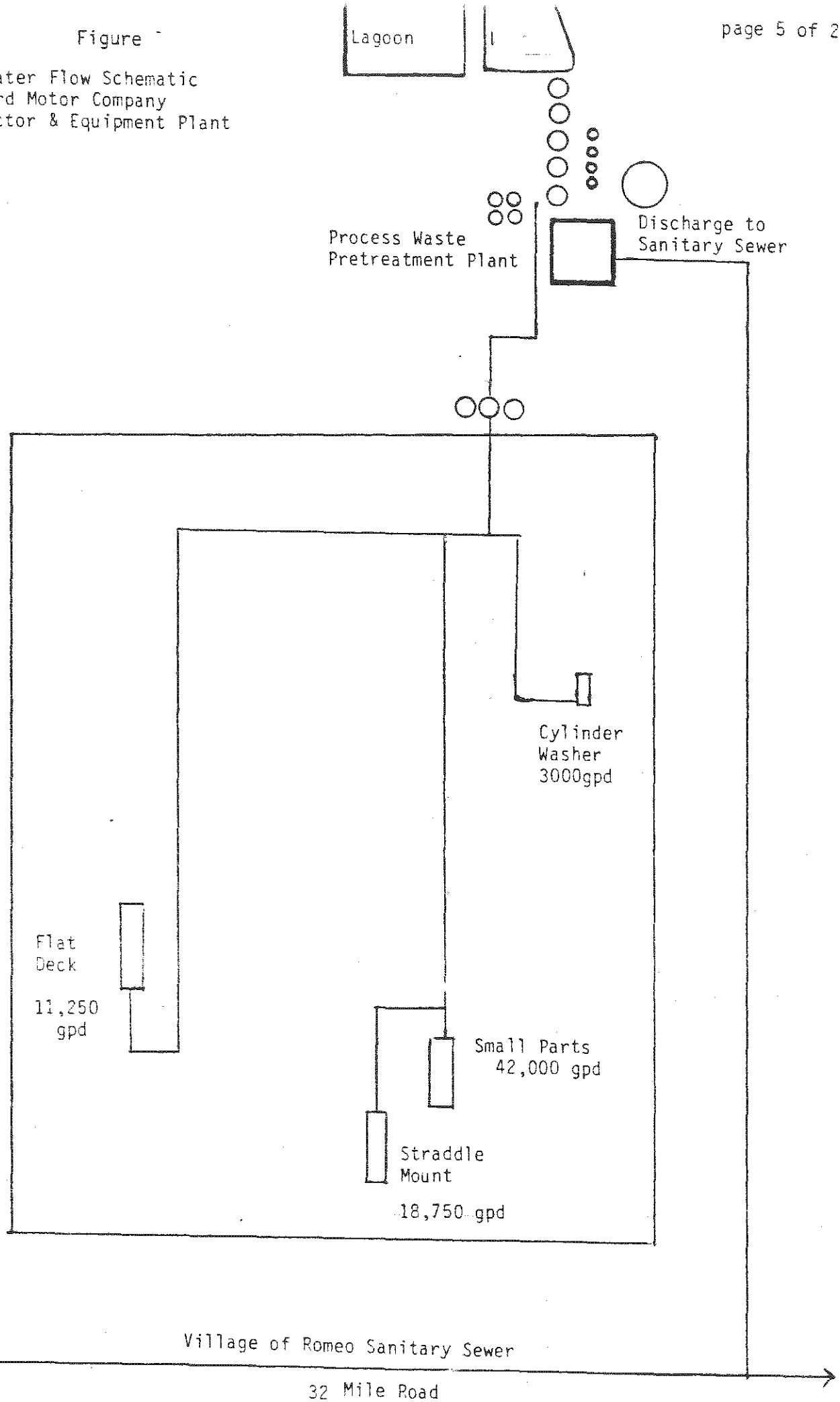
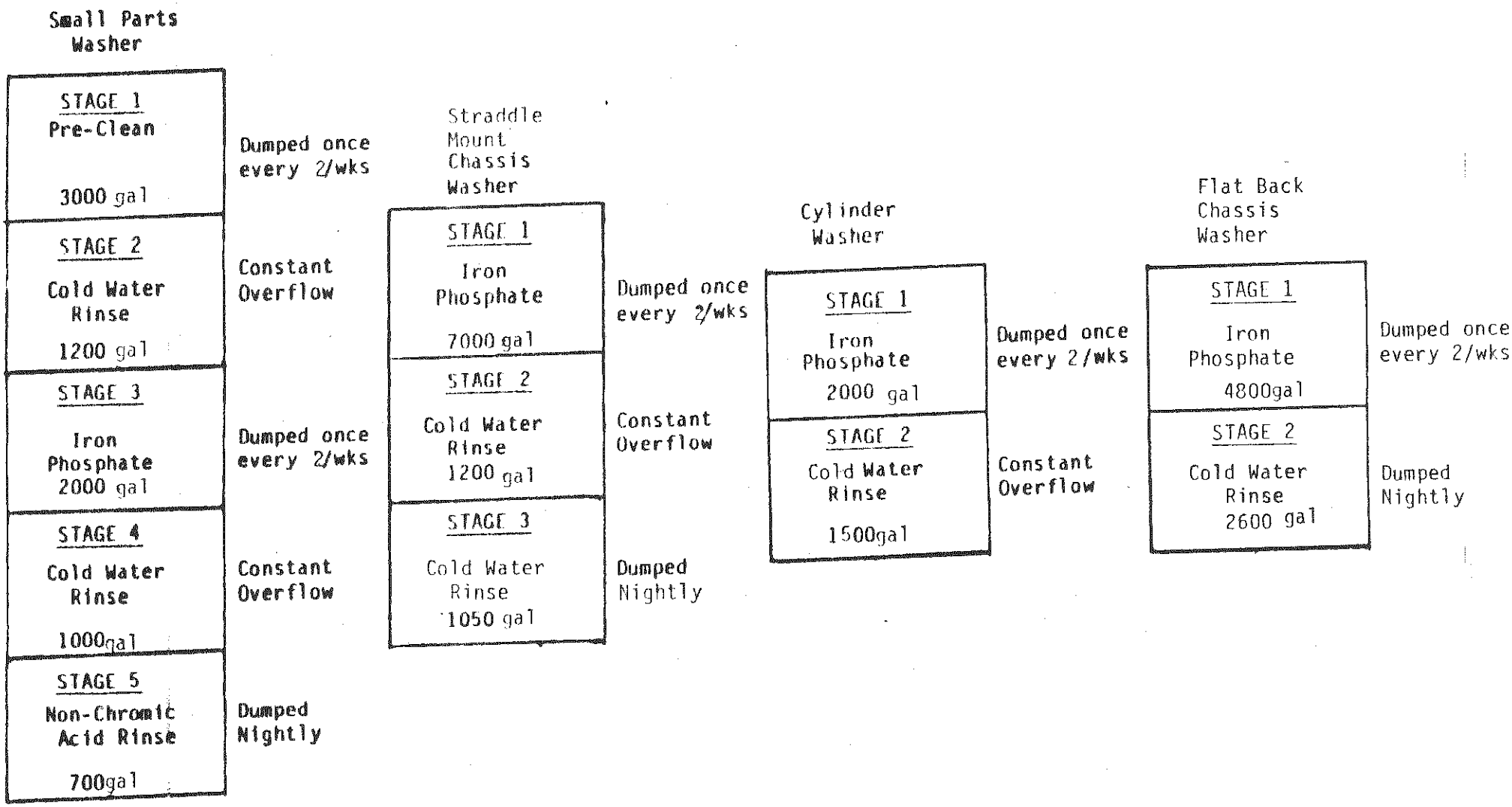


Figure 3

Romeo Tractor Plant
Phosphate Systems



Sludge Generation

The approximate rate of sludge generation at the petitioner's facility from the centrifuge operation at present is approximately 260 cubic yards per year. It has been estimated that the amount of sludge now in the two lagoons is 300 cubic yards.

Data Summary

Table 1 summarizes the analytical average results for heavy metals as they were determined in both the filtered EP leachate and in the sample as received (wet) and for total cyanide in the sample as received. A mathematical calculation of the maximum level possible for cyanide is also shown, as if a distilled water leaching had been performed. The 80% upper confidence level has been calculated for the metals in the leachate and the number of samples verified to ensure representativeness of the data in accordance with the procedures outlined in USEPA SW846, 2nd edition, "Test Methods for Evaluating Solid Wastes."

As can be seen from the table, the 80% upper confidence levels are such that the sludge is not EP-toxic. Therefore, these sludges, being also non-ignitable, non-corrosive, and non-reactive, should be considered to be non-hazardous. Accordingly, the petition for delisting should be approved by EPA.

Table 1

Romeo Tractor and Equipment Plant
Delisting Petition Data Summary

Parameters	West Lagoon Sludge			East Lagoon Sludge		
	Avg. Leachate Concentration (mg/L)	Leachate UCL Concentration (mg/L)	Avg. Sample Concentration (mg/kg,wet)	Avg. Leachate Concentration (mg/L)	Leachate UCL Concentration (mg/L)	Avg. Sample Concentrati (mg/kg,wet)
Arsenic	.007	.009	1.8	.008	.01	2.8
Barium	.4	.4	480	.23	.27	603
Cadmium	.03	.04	7.2	.03	.034	12
Chromium	.03	.04	183	.02	.02	345
Copper	.14	.31	43	.03	.04	104
Lead	.23	.51	367	.10	.16	945
Mercury	<.0005	<.0005	<.1	<.0005	<.0005	<0.1
Nickel	.34	.36	13	.4	.43	18
Selenium	<.005	<.005	<.1	<.005	.005	<0.1
Silver	<.03	.04	<.76	<.02	<.02	<.8
Zinc	.56	.72	395	.60	.88	465
Cyanide	<1.0	<1.0	.3	<1.0	<1.0	.9
	WTP Centrifuge Sludge wo/PO_4 [1]			WTP Centrifuge Sludge w/PO_4		
Arsenic	.007	.01	2.0	.011	.015	3.0
Barium	.15	.20	350	.33	.70	440
Cadmium	.02	.024	6.7	.02	.026	12.4
Chromium	<.02	<.02	61	<.02	<.02	98
Copper	.02	.024	49	<.02	<.02	71
Lead	<.05	<.05	169	<.05	<.05	228
Mercury	<.0005	<.0005	<.1	<.0005	<.0005	<.1
Nickel	.24	.3	8.4	.22	.27	11.3
Selenium	<.005	<.005	<.1	<.005	<.005	<.1
Silver	<.02	<.02	<.85	<.02	<.0.2	.8
Zinc	1.2	1.9	360	1.08	2.4	883
Cyanide	<1.0	<1.0	.28	<1.0	<1.0	<.25

(WTP) Waste Treatment Plant
(UCL) Upper Confidence Level

[1] without phosphate tank cleaning

Sampling Procedures

The sampling of the sludge was based on the guidelines described in the 2nd edition of SW846.[1] An effort was made to collect valid, representative samples reflective of daily plant operations. Samples were collected between May 6 and August 2, 1983.

Lagoon Sampling (Note Figure 4)

Simple random sampling was the sampling strategy used to collect the samples. A grid pattern was measured off and marked along the perimeter of the lagoons with wooden stakes. A number was assigned to each unit. A random number table was used to determine which unit would be sampled and in which order. The stars located on Figure 4 indicate the unit sampled.

A 15 foot PVC pipe with a 1½" I.D. was used to collect the samples. The pipe was pushed down through the sludge to the bottom of the lagoon. The pipe was capped and pulled up out of the sludge. When the cap was removed a sample of the entire sludge column was released into a plastic bucket. Four core samples were taken from each unit and composited into the bucket. The 4 samples were taken from the corners of the unit. The composite was mixed well and approximately 2 liters of sludge representing the unit composite was collected for analysis. The samples were collected by:

Personnel:

- Ms. Kathryn Burge
  Ford Motor Company
  Stationary Source Environmental Control Office
  M.S. Biology
  Four (4) years environmental control experience

- Mr. Thomas Geyer
  Ford Motor Company
  Stationary Source Environmental Control Office
  B.S. Chemistry
  Nine (9) years environmental control experience

Equipment:

15' sections of 1½" I.D. PVC tube. Samples mixed in plastic bucket then transferred to Nalgene containers.

Centrifuge Sludge Sampling

Eight (8) centrifuge sludge cake samples were collected over the two month period. Four (4) samples were collected of centrifuge sludge from treatment tanks containing a minimum of phosphate wastewater and four (4) samples were collected of centrifuge sludge from treatment tanks containing high amounts of phosphate waste.

---

[1]USEPA Test Methods for Evaluating Solid Waste, SW846, Second Edition.

Samples were collected by taking small amounts of centrifuge sludge from the hopper throughout the batch tank dump in order to obtain a composite. The individual that collected the samples was:

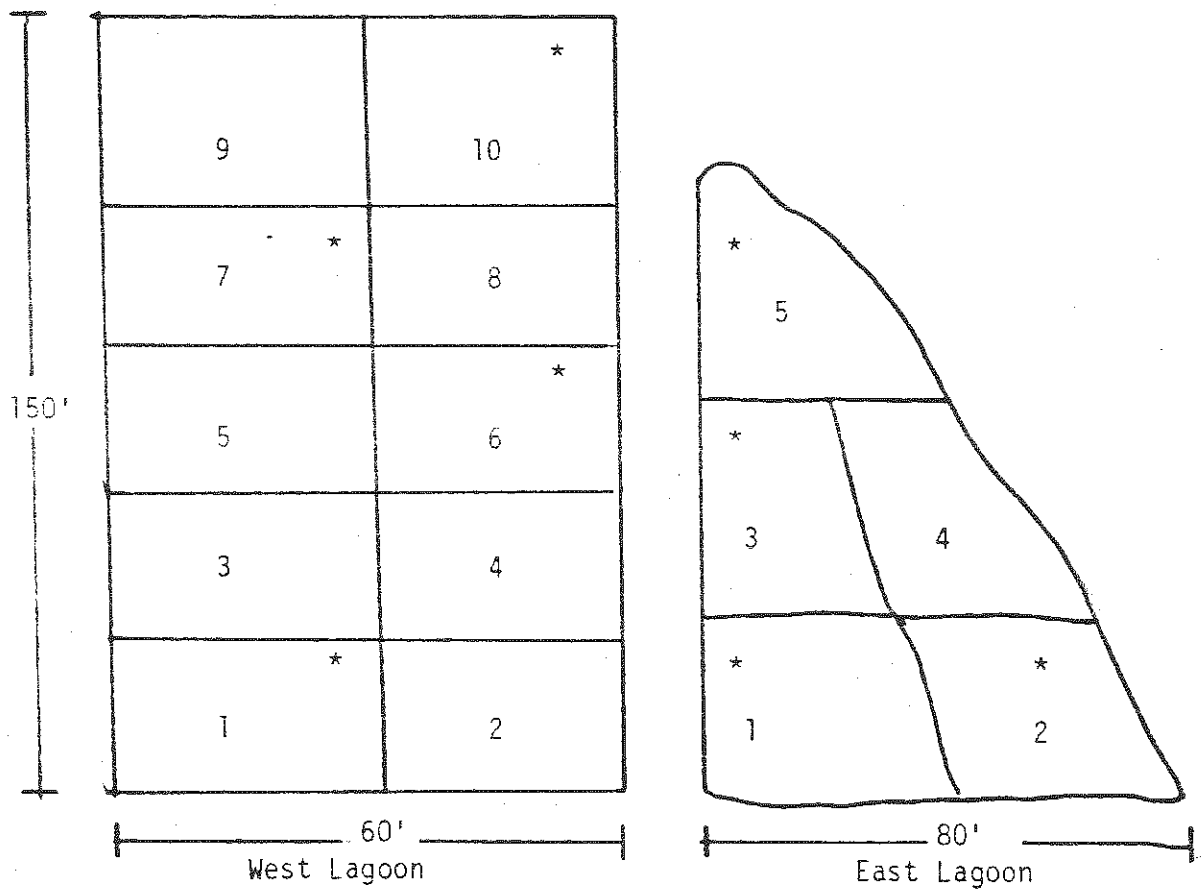
Mr. Les Bauer
Romeo Tractor Plant
Sanitary Waste Treatment License
Six (6) years experience as industrial waste treatment operator

Equipment:

The samples were scooped directly into Nalgene containers.

Figure 4

ROMEO TRACTOR AND EQUIPMENT PLANT
SLUDGE LAGOONS



* Indicate units sampled

Analytical Procedures

Leaching Procedure

Lagoon sludges and waste treatment plant filter cake samples were leached as received. Sludges obtained from waste treatment plants not utilizing filter presses were pressure filtered to form simulated filter cakes.

All samples were leached with an appropriate volume of D.I. water. This mixture was mechanically stirred for a 24-hour period during which time the pH was maintained at 5.0±0.2 using dilute acetic acid. Following leaching, the sample was pressure filtered through a 0.45u membrane filter. The filtered leachate was collected and preserved at a pH<2 with nitric acid.

The procedure follows, precisely, the Method 1310 outlined in EPA Manual SW846, 2nd edition, "Test Methods for Evaluating Solid Waste." The persons performing this procedure and the equipment used are listed below:

Personnel:

- Ms. Rhonda Berger
  Ford Motor Company
  Stationary Source Environmental Control Office
  B.S. in Environmental Sciences
  Four (4) years environmental experience

Equipment:

Millipore Pressure Filter Model YT30 142HW
3000 ml Pyrex Organic Reaction Vessel
Stainless Steel Stirring Blade
Stirring Motor
Extech Model 631 pH-temp. meter

Personnel:

- Ms. Sue Scott
  Hydro Research Services
  Supervisor
  Eight (8) years analytical experience

- Ms. Mary Jones
  Hydro Research Services
  B.A. Chemistry
  Two (2) years analytical experience

- Ms. Nancy Campbell
  Hydro Research Services
  B.A., M.A. Education
  Ten (10) years as science teacher

- Ms. Cathy Novak
  Hydro Research Services
  Certified Laboratory Technologist
  Three (3) years experience

Equipment:

Rae Corporation Slow Speed Stirrer, Model #5VB
Millipore Pressure Filtration System, Model #XX6700P10
Corning Digital PH Meter, Model #110

Metals Analysis

Sludge preparation for the analyses of metals, except Mercury, employed either the nitric/hydrochloric or nitric/hydrochloric/peroxide digestions as per SW846 Methods 3010 and 3050 respectively. The digestion of sludge for Mercury analyses was performed by Method 7471. The previously acidified leachates were not digested.

Atomic absorption analyses for both sludge and leachate samples conformed to the follwoing methods:

Parameter	Method Description	Reference SW846, 2nd Edit. Method
Arsenic	Gaseous hydride	7061
Barium	Direct aspiration	7080
Cadmium	Direct aspiration/standard addition	7130
Chromium	Direct aspiration/standard addition	7190
Copper	Direct aspiration	7210
Lead	Direct aspiration	7420
Mercury	Cold vapor	7471
Nickel	Direct aspiration/standard addition	7520
Selenium	Gaseous hydride	7741
Silver	Direct aspiration	7760
Zinc	Direct aspiration	7950

The individuals performing the metals analyses and the instrumentation employed are as follows:

Personnel:

Ms. Cecilia Vernaci
Hydro Research Services
B.S. Biology
Four (4) years analytical experience

Ms. Mary Jones
Hydro Research Services
B.A. Chemistry
Two (2) years analytical experience

Ms. Rhonda Berger
Ford SSECO
B.S. Environmental Science
Four (4) years environmental experience

Mr. Robert Singer
Ford SSECO
Some college chemistry
Seven (7) years environmental experience

Instrumentation: Instrumentation Laboratory Model 353 Atomic Absorption Spectrophotometer

Instrumentation Laboratory Model 151 Atomic Absorption Spectrophotometer

Cyanide Analysis

Cyanide analyses were conducted on the actual sludge samples. The initial sample preparation and distillation conformed to Method 9010 of SW846 2nd Edition. A color development step corresponding to EPA Method 335.2, i.e., pyridine/barbituic acid, was substituted for the silver nitrate titration as outlined in Method 9010. The primary purpose for this change was to obtain acceptable detection limits while minimizing the affect of possible interferences.

The names and qualifications of the individuals performing the analyses and instruments used are as follows:

Personnel:

- Ms. Sue Scott
  Hydro Research Services
  Supervisor
  Eight (8) years analytical experience

- Ms. Mary Jones
  Hydro Research Services
  B.A. Chemistry
  Two (2) years analytical experience

- Ms. Nancy Campbell
  Hydro Research Services
  B.A., M.A. Education
  Ten (10) years teaching experience

- Ms. Cathy Novak
  Hydro Research Services
  Certified Laboratory Technologist
  Three (3) years experience

Instrumentation:

Bausch & Lomb Spectronic 88 Spectrophotometer

Results

Tables 2, 3, 4 and 5 contain the individual sample results from which the data summary (Table 1) was derived. Table 2 summarizes the heavy metals data for the leachate. Table 3 shows the standard addition data for cadmium, chromium and nickel. Table 4 reports the total cyanide values plus standard addition results. Cyanide results are reported on sample as received. Theoretical results for cyanide by standard addition are also listed and are calculated based on the weight of sample used. Table 5 includes the total metals values for the heavy metals, and also the % solids determination for each sludge sample.

Table 2

Summary of Analytical Data
Romeo Tractor Plant
Sludge Leachate Metals (mg/l)

Date Sampled	Sample Description	As	Ag	Ba	Cd [1]	Cr [1]	Cu	Hg	Ni [1]	Pb	Se	Zn
5-31-83	W. Lagoon Sludge Unit 1	.009	<.05	.4	.04	<.05	<.05	<.0005	.32	.07	<.005	.83
5-31-83	W. Lagoon Sludge Unit 6	.009	<.02	.4	.02	<.02	<.02	<.0005	.38	<.05	<.005	.43
5-31-83	W. Lagoon Sludge Unit 7	.006	<.02	.4	.03	<.02	<.02	<.0005	.34	<.05	<.005	.41
5-31-83	W. Lagoon Sludge Unit 10	<.005	<.02	.4	.02	.04	.45	<.0005	.33	.75	<.005	.56
5-31-83	E. Lagoon Sludge Unit 1	.008	<.02	.2	.02	<.02	.02	<.0005	.34	.20	<.005	.33
5-31-83	E. Lagoon Sludge Unit 2	.005	<.02	.3	.03	<.02	.04	<.0005	.40	.11	<.005	.42
5-31-83	E. Lagoon Sludge Unit 3	.01	<.02	.2	.03	.02	.02	<.0005	.42	<.05	<.005	1.1
5-31-83	E. Lagoon Sludge Unit 5	.01	<.02	.2	.03	<.02	.03	<.0005	.42	<.05	<.005	.56
6-2-83	WTP Centrifuge Sludge wo/PO_4	<.005	<.02	.2	.02	<.02	<.02	<.0005	.28	<.05	<.005	2.0
6-8-83	WTP Centrifuge Sludge wo/PO_4	<.005	<.02	.2	.03	<.02	<.02	<.0005	.25	<.05	<.005	1.8
6-18-83	WTP Centrifuge Sludge wo/PO_4	<.005	<.02	<.1	.02	<.02	<.02	<.0005	.13	<.05	<.005	.43
6-21-83	WTP Centrifuge Sludge wo/PO_4	.014	<.02	<.1	.02	<.02	<.03	<.0005	.28	<.05	<.005	.50
6-7-83	WTP Centrifuge Sludge w/PO_4	<.005	<.02	1.0	.03	<.02	<.02	<.0005	.30	<.05	<.005	3.5
6-19-83	WTP Centrifuge Sludge w/PO_4	.011	<.02	<.1	.02	<.02	.02	<.0005	.18	<.05	<.005	.18
6-20-83	WTP Centrifuge Sludge w/PO_4	.012	<.02	<.1	.02	<.02	<.02	<.0005	.22	<.05	<.005	.34
8-2-83	WTP Centrifuge Sludge w/PO_4	.016	<.02	0.1	.01	<.02	<.02	<.0005	.17	<.05	<.005	.33

wo/PO_4 -- Sludge sample containing minimum PO_4 waste.

w/PO_4 -- Sludge sample containing maximum PO_4 waste.

[1] By standard addition

Table 3

Summary of Analytical Data
Romeo Tractor and Equipment Plant
Leachate and Standard Addition Results (mg/l)

Date Sampled	Sample Description	Cd Neat	Cd Spike 1	Cd Spike 2	Cd Spike 3	Cr Neat	Cr Spike 1	Cr Spike 2	Cr Spike 3	Ni Neat	Ni Spike 1	Ni Spike 2	Ni Spike 3
5-31-83	W. Lagoon Sludge Unit 1*	.00	.54	1.04	1.48	<.1	.92	1.72	3.32	.32	.9	1.48	2.46
5-31-83	W. Lagoon Sludge Unit 6	.02	.99	2.04	3.19	<.02	1.04	2.04	3.26	.38	1.40	2.38	3.46
5-31-83	W. Lagoon Sludge Unit 7	.03	.99	2.02	3.05	<.02	1.04	2.18	3.18	.34	1.32	2.32	3.32
5-31-83	W. Lagoon Sludge Unit 10	.02	.98	1.95	3.08	.04	1.04	2.14	3.08	.33	1.32	2.28	[illegible]
5-31-83	E. Lagoon Sludge Unit 1	.02	.99	1.98	3.12	<.02	.96	2.06	3.14	.34	1.36	2.28	3
5-31-83	E. Lagoon Sludge Unit 2	.03	.98	1.99	3.02	<.02	.98	2.04	3.12	.40	1.30	2.30	3.18
5-31-83	E. Lagoon Sludge Unit 3	.03	1.00	1.94	3.01	.02	.98	2.04	3.08	.42	1.36	2.32	3.36
5-31-83	E. Lagoon Sludge Unit 5 1/	.03	1.02	1.99	3.08	<.02	1.06	2.10	3.12	.42	1.42	2.46	3.44
6-2-83	WTP Centrifuge Sludge wo/PO_4	.02	.98	2.01	3.08	<.02	1.00	2.04	2.94	.28	1.30	2.16	3.24
6-8-83	WTP Centrifuge Sludge wo/PO_4	.03	.96	1.95	3.06	<.02	1.06	2.02	3.02	.25	1.16	2.18	3.22
6-18-83	WTP Centrifuge Sludge wo/PO_4	.02	1.0	2.0	3.0	<.02	1.02	2.04	3.20	.13	1.04	2.12	3.14
6-21-83	WTP Centrifuge Sludge wo/PO_4	.02	1.02	2.04	3.12	<.02	1.08	2.12	3.26	.28	1.28	2.26	3.30
6-7-83	WTP Centrifuge Sludge w/PO_4	.03	.96	1.90	3.04	<.02	1.06	1.98	3.08	.30	1.26	2.28	3.30
6-19-83	WTP Centrifuge Sludge w/PO_4 2/	.02	1.02	2.06	3.14	<.02	1.00	2.20	3.34	.18	1.10	2.12	3.06
6-20-83	WTP Centrifuge Sludge w/PO_4	.02	1.00	2.00	3.06	<.02	1.00	2.10	3.16	.22	1.18	2.20	3.24
8-2-83	WTP Centrifuge Sludge w/PO_4	.01	.98	1.99	2.92	<.02	1.02	2.06	2.96	.17	1.06	2.14	3.20

*Standard Additions for Cd, Cr, Ni

	Spike 1	Spike 2	Spike 3
Cd:	0.50 ppm	1.0 ppm	1.5 ppm
Cr:	1.0	2.0	4.0
Ni:	0.50	1.0	2.0

Standard Additions for Cd, Cr, Ni

Spike 1 - 0.5 ppm

Spike 2 - 1.0 ppm

Spike 3 - 1.5 ppm

Notes:

1/ wo/PO_4: Sludge samples containing minimum PO_4 waste.

2/ w/PO_4: Sludge samples containing maximum PO_4 waste.

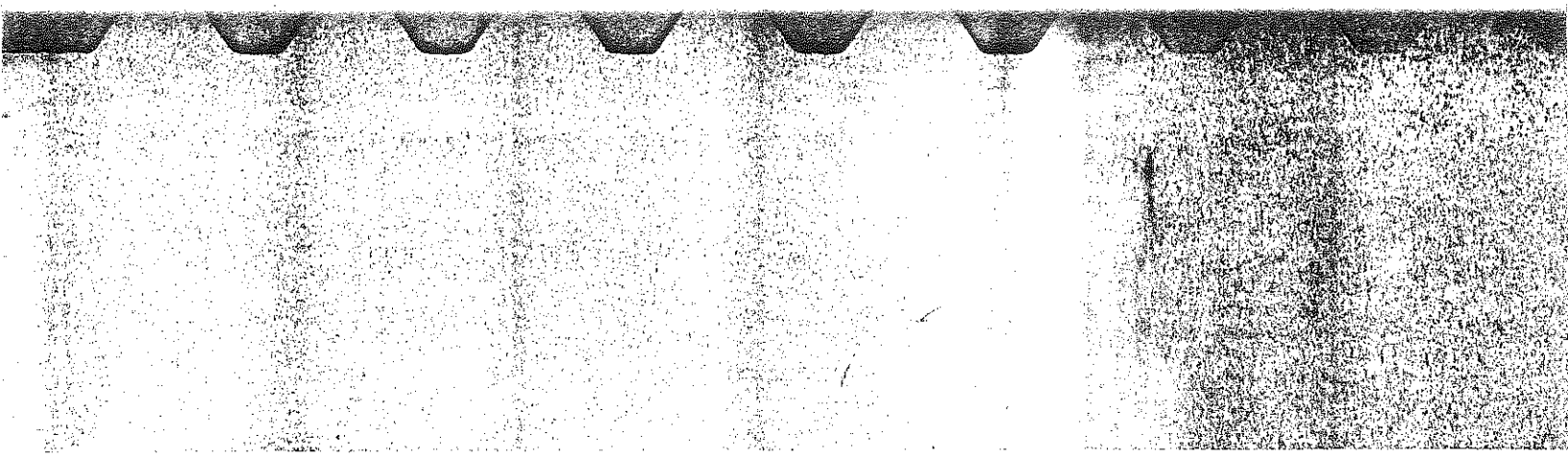


Table 4
Summary of Analytical Data
Romeo Tractor Plant
Total Cyanide and Standard Addition Results

Sampled	Sample Description	Total Cyanide As Received	Spike 1 Actual	Spike 1 Theo-retical	Spike 2 Actual	Spike 2 Theo-retical	Spike 3 Actual	Spike 3 Theo-retical	Spike 4 Actual	Spike 4 Theo-retical
5-31-83	W. Lag. Sludge Unit 1	<.2	1.3	0.8	2.9	2.0	5.3	3.7	---	---
5-31-83	W. Lag. Sludge Unit 6	.3	0.8	0.8	1.5	1.9	2.9	3.6	---	---
5-31-83	W. Lag. Sludge Unit 7	.3	0.7	0.8	1.7	1.9	3.0	3.6	---	---
5-31-83	W. Lag. Sludge Unit 10	<.2	0.7	0.8	1.6	1.9	3.2	3.8	---	---
5-31-83	E. Lag. Sludge Unit 1	.6	---	---	1.7	2.5	2.5	4.4	5.3	11
5-31-83	E. Lag. Sludge Unit 2	.6	1.0	1.5	1.9	3.0	3.7	5.1	---	---
5-31-83	E. Lag. Sludge Unit 3	1.4	---	---	2.2	3.8	3.7	6.3	6.1	11
5-31-83	E. Lag. Sludge Unit 5	1.1	---	---	1.8	3.5	3.8	5.9	5.6	10
6-2-83	WTP Cent.Sludge WO/PO_4 (1)	<.2	1.2	1.1	1.5	2.3	2.2	3.4	---	---
6-8-83	WTP Cent.Sludge WO/PO_4	<.2	1.1	0.8	1.7	2.2	3.6	4.7	---	---
6-18-83	WTP Cent.Sludge WO/PO_4	.3	1.1	1.3	2.6	2.8	4.6	5.3	---	---
6-21-83	WTP Cent.Sludge WO/PO_4	.4	1.2	1.3	2.2	2.6	4.1	4.6	---	---
6-7-83	WTP Cent.Sludge W/PO_4 (2)	<.2	1.0	1.0	2.2	2.4	4.4	4.9	---	---
6-19-83	WTP Cent.Sludge W/PO_4	<.2	.9	.9	2.1	2.3	3.5	4.7	---	---
6-20-83	WTP Cent.Sludge W/PO_4	<.3	.9	.8	2.3	2.4	3.9	4.9	---	---
8-2-83	WTP Cent.Sludge W/PO_4	<.3	.5	.9	1.0	2.2	1.8	4.0	---	---

Notes:
(1) WO/PO_4: Sludge samples containing minimum PO_4 waste
(2) W/PO_4: Sludge samples containing maximum PO_4 waste

Table 5

Summary of Analytical Data
Romeo Tractor Plant
Total Metals from Sludge (mg/l)

Date Sampled	Sample Description	As	Ag	Ba	Cd	Cr	Cu	Hg	Ni	Pb	Se	Zn	% Solids
5-31-83	W. Lagoon Sludge Unit 1	---	<.65	300	4.57	202	45.1	--	15	359	--	418	37.1
5-31-83	W. Lagoon Sludge Unit 6	2.2	<0.8	440	8.0	180	49	<0.1	13	360	<0.1	400	37.8
5-31-83	W. Lagoon Sludge Unit 7	2.0	<0.8	560	8.3	200	42	<0.1	13	430	<0.1	450	36.7
5-31-83	W. Lagoon Sludge Unit 10	1.2	<0.8	440	7.9	150	34	0.1	11	320	<0.1	310	36.2
5-31-83	E. Lagoon Sludge Unit 1	2.8	<0.8	760	10	270	50	<0.1	16	610	<0.1	440	47.6
5-31-83	E. Lagoon Sludge Unit 2	2.6	<0.8	330	9.7	300	67	<0.1	17	480	<0.1	480	44.3
5-31-83	E. Lagoon Sludge Unit 3	2.7	<0.8	840	19	610	250	<0.1	22	2300	<0.1	510	43.6
5-31-83	E. Lagoon Sludge Unit 5	2.9	<0.8	480	7.6	200	48	<0.1	16	390	<0.1	430	42.7
6-2-83	WTP Centrifuge Sludge wo/PO_4	1.4	<0.8	110	2.9	41	38	<0.1	5.9	160	<0.1	240	23.6
6-8-83	WTP Centrifuge Sludge wo/PO_4	1.8	<0.8	280	6.7	53	35	<0.1	7.5	200	<0.1	310	25.1
6-18-83	WTP Centrifuge Sludge wo/PO_4	1.7	<0.9	440	7.0	51	44	<0.1	7.0	170	<0.1	280	18.7
6-21-83	WTP Centrifuge Sludge wo/PO_4	2.9	<0.9	570	10	98	79	<0.1	13	300	<0.1	610	51.7
6-7-83	WTP Centrifuge Sludge w/PO_4	1.8	<0.8	260	3.5	55	42	<0.1	6.9	180	<0.1	280	24.2
6-19-83	WTP Centrifuge Sludge w/PO_4	2.6	<0.9	290	12	67	55	<0.1	8.1	160	<0.1	400	33.5
6-20-83	WTP Centrifuge Sludge w/PO_4	4.0	<0.9	740	14	130	110	<0.1	15	330	<0.1	1400	58.6
8-2-83	WTP Centrifuge Sludge w/PO_4	3.5	<0.6	470	23	140	75	<0.1	15	240	<0.1	1450	44.4

Notes:
(1) WO/PO_4: Sludge samples containing minimum PO_4 waste
(2) W/PO_4: Sludge samples containing maximum PO_4 waste

Statistical Calculations

In accordance with EPA Manual SW-846, 2nd edition, statistical calculations were performed on the leachate data for the heavy metals in order to determine for each the concentration that would not be exceeded in a leachate 80% of the time, i.e., an 80% Upper Confidence Limit (UCL). The results of these calculations appear in Table 1. The formula that was used appears below along with an example calculation using the lead data for the west lagoon.

Upper Confidence Limit = $\bar{x} + t_{0.20}\, s_{\bar{x}}$, where:

$\bar{x}$ = mean of sample measurements

$t_{0.20}$ = the student's "t" value for a two-tailed confidence interval, a probability of 0.20, and n-1 degrees of freedom (df), where n is the number of samples.

$s_{\bar{x}}$ = the standard deviation of the sample mean.

Sample UCL Calculation:

$$\bar{x} = \frac{0.07 + 0.05 + 0.05 + 0.75}{4} = 0.23 \text{ mg/l}$$

$t_{0.20,df=3} = 1.638$

$s_{\bar{x}} = 0.17$

$UCL_{Pb} = 0.23 \text{ mg/l} + (1.638)(0.17 \text{ mg/l}) = 0.51 \text{ mg/l}$

Certification Statement

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this demonstration and all attached documents, and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibilities of fine and imprisonment.

, Manager

Plant Engineering Dept.
Romeo Tractor Plant

Mailed 8/19/83